

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.:

Activity No. PER20080019
Agency Interest 1468

Ms. Michelle Eaglin
Environmental Engineer Manager
Rubicon LLC
9156 Highway 75
P.O. Box 517
Geismar, Louisiana 70734-0517

RE: Part 70 Operating Permit Renewal/Modification, MDI Plant, Rubicon LLC, Geismar, Ascension Parish, Louisiana

Dear Ms. Eaglin:

This is to inform you that the Part 70 operating permit modification for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the application submitted and the approval in no way relieves the applicant of the obligation to comply with all applicable requirements.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number cited below and the Agency Interest Number 1468 should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 2391-V9

Sincerely,

Cheryl Sonnier Nolan.
Assistant Secretary

CSN:mv
c: US EPA Region VI

**AIR PERMIT BRIEFING SHEET
PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**MDI PLANT; AI No. 1468; PER20080019
RUBICON, LLC
GEISMAR, ASCENSION PARISH, LOUISIANA**

I. BACKGROUND

Rubicon, LLC is a chemical manufacturer of a variety of organic and inorganic chemicals at their Geismar Facility and has been in operation since 1966. The MDI plant previously operated under several permits. MDI 1 operated under Air Permit Nos. 84 (issued on October 1971) and 1028T (issued on November 1979). MDI 2 operated under Air Permit No. 1964 issued on July 1987. An administrative change was issued on February 20, 1992. The Variants unit operated under Air Permit No. 279T (M-1). The Title V Permit Nos. 2391-V0, 2391-V1, 2391-V2, 2391-V3, 2391-V4, 2391-V5, 2391-V6 and 2391-V7 were issued on June 17, 1998, May 13, 1999, June 23, 2000, January 18, 2001, January 13, 2004, July 12, 2004, March 9, 2005 and December 22, 2005 respectively. Currently the facility operates under Permit No. 2391-V8, dated June 22, 2007.

II. ORIGIN

A permit application dated July 8, 2008 was submitted requesting a Part 70 operating permit renewal/modification.

III. DESCRIPTION

The MDI Plant includes the MDI 1, MDI 2, MDI 3, and Variants process units. Methylene diphenyl diisocyanate (MDI) is produced in the MDI 1, MDI 2, and MDI 3 process units. The product MDI is then processed into either pure MDI or combined with blend additives in the Variants process unit to make various MDI-based products.

Several processing activities are operated to support the production of MDI. These include the production of diaminodiphenyl methane (DADPM in 2 units) and its consequent reaction with phosgene to form MDI in the MDI 1, MDI 2, and MDI 3 units.

The product MDI is then processed into either a pure product (pure MDI) or combined with blend additives to produce various MDI based products at the Variants unit. The following are brief descriptions of processes involved in producing MDI.

Phosgene Process

The phosgene (COCl_2) manufacturing process uses chlorine and carbon monoxide (CO) as its raw material feeds. Excess CO and gaseous chlorine are fed through catalyst-filled tubes in an exchanger to produce phosgene. The phosgene which is produced is condensed for subsequent use in the MDI manufacturing process. Carbon tetrachloride, a coincidental reaction by-product, and other noncondensables are vented through the caustic scrubber in the MDI 1 plant, and through the caustic scrubbers to the North Waste West boiler (Emission Point IA, Permit No. 3037-V1) under normal operation in the MDI 2 and MDI 3 plants.

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DADPM Batch Process

DADPM is a precursor to MDI. The DADPM process consists of reaction and neutralization steps that are followed by product washing and stripping of impurities from the product stream.

Aniline and hydrochloric acid (HCl) solution are mixed in reactors with aqueous formaldehyde to make DADPM. Residual HCl from the reaction is neutralized with sodium hydroxide (NaOH) solution to form an aqueous brine wastewater. The crude DADPM is then purified by washing and stripping to remove residual salt, NaOH, and dissolved aniline, which is recovered and recycled back into the process.

DADPM Continuous Process

The proposed Continuous DADPM Unit (CDU) will consist primarily of new reactors, isomerization towers, static mixers, and plate coolers. The CDU will be built in the existing DADPM-2 Plant.

A CDU Feed Drum is designed to stabilize flow through the train. In the Feed Drum, hydrogen chloride gas (HCl) reacts with aniline. Feeding HCl as an aqueous solution is also possible. The contents of the Feed Drum are pumped through a series of reactors and coolers. Formalin (a formaldehyde solution in water) is injected into the CDU reactor train at multiple points. Each injection point is followed by a reactor to provide sufficient time for the Formalin to completely react. Each reactor is preceded by a plate cooler to remove the heat of reaction. A static mixer is installed upstream and downstream of each formalin injection point. The last reactor discharges to Buffer Vessels.

The Buffer Vessels act as feed vessels for the Isomerization Towers and control the process temperature. The existing "E" and "F" DADPM reactors will function as the Buffer Vessels. Two (2) DADPM reactors are needed for startup and so a spare is available in case equipment maintenance or repair is needed. The Isomerization Towers provide residence time to complete DADPM isomerization.

The outlet of the Isomerization Towers is mixed with caustic to neutralize acid. The vapor from the Neutralizer is scrubbed to remove DADPM and salt. The Neutralizer contents are pumped to a separator to phase separate the organic and aqueous phases. The Neutralizer Separator phases will gravity drain and the output will continue to the Workup Section. An existing Amine Brine Receiver collects various Rework streams and pump them to the Neutralizer. A pump-through evaporator flashes off water in the Neutralizer to ensure proper operation of the Effluent Extractor.

MDI Process

DADPM and COCl₂ are used with chlorobenzene (MCB) as a diluent to manufacture MDI. HCl is also generated as a by-product.

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The reaction products enter a series of condensers where most of the MCB and unreacted COCl₂ are condensed and returned to the process. Any uncondensed vapors are scrubbed with cold MCB in the phosgene absorber and are returned to the process. The HCl vapor exiting from the top of the phosgene absorber is absorbed in water to form an acid solution. The overhead stream from the HCl absorber is then directed to the caustic scrubber for final reaction and neutralization in the MDI 1 plant, and through the caustic scrubbers to the North Waste West boiler (Emission Point IA, Permit No. 3037-V1) under normal operation in the MDI 2 and MDI 3 plants. The HCl solution by-product is cooled and stored prior to use elsewhere on Rubicon's site or for shipment for outside sales. Crude MDI is further purified by distillation to remove MCB and any remaining phosgene.

The Anhydrous HCl Export Section compresses anhydrous HCl from the MDI process units and transports the stream to offsite customers via pipeline.

MDI Pure and Variants

Rubicon's MDI Pure process separates the isomers of MDI to produce pure MDI product. The Variants process combines the MDI with blending additives to produce MDI based products.

In this renewal/modification, Rubicon requested the following changes:

1. The increase of the MDI 2 Cooling Tower flowrate from 13,600 gal/min to 25,000 gal/min (EQT0422).
2. The update of the equipment list.
3. The update of the effluent line cleaning calculations.
4. The update of the throughput for the following emission sources,
 - KK (EQT389)
 - KV (MF-4503C); (RLP036)
 - MC, (MF-4503I); (EQT404)
 - MG, (MS-4518, MS-4519); (RLP040)
 - MH-1; (EQT413)
 - MH-2; (EQT414)
 - MK; (EQT415)
 - MN; (EQT417)
 - MX; (EQT424)
5. The incorporation of the HCl operations currently permitted in the Maleic Anhydride Plant Part 70 Permit No. 3037-V1 issued on August 13, 2008.
6. The addition of the Miscellaneous Organic NESHAP (MON) MACT applicability.
7. The revision of the emission limits from the facility's remaining emission points sources based on updated emission factors and/or current facility conditions.

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Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	9.89	10.72	+0.83
SO ₂	—	—	—
NO _x	—	—	—
CO	816.28	816.28	—
VOC*	188.05	190.39	+2.34

***VOC LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs), (TPY):**

Pollutants	Before	After	Change
4,4'-Methylenebisbenzeneamine	1.67	1.67	—
Aniline	4.25	4.25	—
Benzene	<0.001	<0.001	—
Carbon tetrachloride	26.07	26.07	—
Chlorobenzene	149.56	150.80	+1.24
Chloroform	0.53	0.53	—
Ethylene glycol	1.55	1.55	—
Formaldehyde	0.45	0.77	+0.32
Methanol	1.42	2.03	+0.61
Methylene diphenyl diisocyanate	2.54	2.53	-0.01
Phenol	<0.001	<0.001	—
Phosgene	0.03	0.20	+0.17
Total TAPs	188.07	190.40	+2.33

Non VOC TAPs, (TPY)	Before	After	Change
Ammonia	1.65	1.65	—
HCl	5.09	5.24	+0.15
Cl ₂	<0.001	<0.001	—
CH ₂ Cl ₂	0.23	0.23	—
Total	6.97	7.12	+0.15

IV. TYPE OF REVIEW:

This permit was reviewed for compliance with the Louisiana Air Quality Regulations, NSPS, and NESHAP. Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) review do not apply.

This facility is a major source of toxic air pollutants (TAP) under LAC 33:III.Chapter 51. Rubicon's Air Toxic Compliance Plan No. 92059 was approved on January 8, 1996.

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V. CREDIBLE EVIDENCE

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. PUBLIC NOTICE:

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 2008; and in *The Gonzales Weekly*, Gonzales, on <date>, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: ISC3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard (NAAQS)
Ammonia	8 hour	612 ug/m ³	640 ug/m ³
Aniline	8 hour	19.9 ug/m ³	181 ug/m ³
Benzene	Annual	2.73 ug/m ³	12 ug/m ³
Carbon Tetrachloride	Annual	0.74 ug/m ³	6.67 ug/m ³
Chlorine	8 hour	1.3 ug/m ³	35.7 ug/m ³
Chlorobenzene	8 hour	85 ug/m ³	1100 ug/m ³
Chloroform	Annual	0.20 ug/m ³	4.30 ug/m ³
Formaldehyde	Annual	0.45 ug/m ³	7.69 ug/m ³

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Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Standard or (National Ambient Air Quality Standard (NAAQS)
Hydrochloric Acid	8 hour	110 ug/m ³	180 ug/m ³
Methylene Chloride	Annual	12.9 ug/m ³	212.77 ug/m ³

VIII. General Condition XVII Activities

ID	Work Activity	Schedule	Emission Rates - tons	
			CO	VOC
No. 1	Formalin storage vessels	3 hours/yr	-	1.7
No. 3	MDI plant filter changes	2190 hours/yr	-	Neg

IX. Insignificant Activities

ID No.	Description	Capacity (units)	Citation
KL	MDI Chiller Tank MS-4234	106 gal	LAC 33:III.501.B.5.A.3
KM	MDI Hot Oil Storage Vessel MS-4826	721 gal	LAC 33:III.501.B.5.A.3
KN	MDI Hot Oil Expansion Vessel MS-4830	282 gal	LAC 33:III.501.B.5.A.3
KP	Pure 1 Blend Tank MS-4926	7191 gal	LAC 33:III.501.B.5.A.3
KR	MDI Hot Oil Gas Heater Vent-GH-4826	1250 scf/hr	LAC 33:III.501.B.5.A.1
KW	Pure 1 Hot Water Supply System Tank	212 gal	LAC 33:III.501.B.5.A.3
KX	MDI 1 Caustic Scrubber Surge Tank MS-4306	4264 gal	LAC 33:III.501.B.5.A.3
KY	MDI Pure 1 Ejector Hot Well	1269 gal	LAC 33:III.501.B.5.A.3
MI	Variants Mixed Reactants Tanks MS-4920	5711 gal	LAC 33:III.501.B.5.A.3
MJ	Variants Glycol Storage MS-4923	6662 gal	LAC 33:III.501.B.5.A.3
ML	Variants Tank MF-4946	6662 gal	LAC 33:III.501.B.5.A.3
MV	Pure 2 Hot Water Supply System Tank	212 gal	LAC 33:III.501.B.5.A.3
MZ	Variants Blending Demounts and Drums	6022 gal	LAC 33:III.501.B.5.A.3
NA	MDI 2 Caustic Scrubber Tank MS-6306	4273 gal	LAC 33:III.501.B.5.A.3
NE	MDI 1 Hot Water Supply System GH-4502	43 gal	LAC 33:III.501.B.5.A.3
NF	MDI 1 Hot Water Supply System GH-4503	43 gal	LAC 33:III.501.B.5.A.3
NG	Variants Hot Water Supply System GH-4504	212 gal	LAC 33:III.501.B.5.A.3
NH	Variants Hot Water Supply System GH-4505	212 gal	LAC 33:III.501.B.5.A.3

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ID No.	Description	Capacity (units)	Citation
NI	Pure 3 Hot Water Supply System GH-9701	212 gal	LAC 33:III.501.B.5.A.3
NJ	Pure 3 Hot Water Supply System GH-9702	212 gal	LAC 33:III.501.B.5.A.3
NK	Pure 3 Hot Water Supply System GH-9703	212 gal	LAC 33:III.501.B.5.A.3
ZG	Caustic Scrubber Surge Tank MS-9306	4274 gal	LAC 33:III.501.B.5.A.3
I-1	Sodium Thiosulfate Tank MS-4307	881 gal	LAC 33:III.501.B.5.A.3
I-2	Sodium Thiosulfate Tank MS-9307	920 gal	LAC 33:III.501.B.5.A.3
I-3	MDI Demounts	7520 gal each	LAC 33:III.501.B.5.A.3
I-4	MDI Drums	55 gal each	LAC 33:III.501.B.5.A.3
I-5	Polyols Tank MS-4858	9400 gal	LAC 33:III.501.B.5.A.3
I-6	Polyols Tank MS-4859	9400 gal	LAC 33:III.501.B.5.A.3
I-7	MDI 1 Emergency Generator (0.51 MM Btu/hr)	-	LAC 33:III.501.B.5.A.5
I-8	MDI 2 Emergency Generator (0.85 MM Btu/hr)	-	LAC 33:III.501.B.5.A.5
I-9	MDI 3 Emergency Generator (0.68 MM Btu/hr)	-	LAC 33:III.501.B.5.A.5
I-10	MS-6701 Amine Brine Receiver	3800 gal	LAC 33:III.501.B.5.D
I-11	MS-6701B Amine Brine Receiver	3800 gal	LAC 33:III.501.B.5.D
I-12	MDI TT/Rail Car Preparation	-	LAC 33:III.501.B.5.D
I-13	Pilot Plant Hot Oil Vessel	244 gal	LAC 33:III.501.B.5.A.2
RQ	MDI 1 Emergency Generator Diesel Storage	251 gal	LAC 33:III.501.B.5.A.3
RR	MDI 2 Emergency Generator Diesel Storage	253 gal	LAC 33:III.501.B.5.A.3
RS	MDI 3 Emergency Generator Diesel Storage	432 gal	LAC 33:III.501.B.5.A.3
I-14	HetD Pilot Plant		LAC 33:III.501.B.5.D
I-15	Foam Tank		LAC 33:III.501.B.5.A.2

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5*	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
UNF006	MDI Plant	1	1							1	1						1	1	1	1
EQT0369	KB - MDI 1 Fume Scrubber AS-4303A																			
EQT0370	KC - MDI 1 Caustic Scrubber AS-4304B																			
EQT0371	MS-4217A - Storage Vessel	3																		
EQT0372	MS-4217B - Storage Vessel	3																		
EQT0373	MS-4217C - Storage Vessel	3																		
EQT0374	MS-4906 - Storage Vessel	3																		
EQT0375	MF-4118 - Storage Vessel	3															1			
EQT0376	MM-4110 - Aniline/Water Weir Box	3															1			
EQT0377	MS-4115 - Aniline/Water Separator																	1		
EQT0378	MS-4118 - Wash Water Feed	3																		
EQT0379	MS-4121 - Wet Aniline Storage	3															1			
EQT0380	MS-4122 - DA/DPM Stripper Overhead Seal Pot Tank	3																		
EQT0381	MS-4158 - Amine Water Pump Out Pot	3																		
EQT0382	KG - MDI 1 Ammonia Solution Tank MF-4512	3																		
EQT0383	MF-4223 - Storage Vessel	3																		
EQT0384	MS-4112A - Storage Vessel	3																		
EQT0385	MS-4112B - Storage Vessel	3																		
EQT0386	MS-4112C - Storage Vessel	3																		
EQT0387	MS-4112D - Storage Vessel	3																		
EQT0388	KJ - Pure 1 Bulk Tank MS-4910	3																		

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		5▲	9	11	13	15	2103	2107	2109	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0389	KK – Pure I Mother Liquor Bulk Tank MS-4913																		
EQT0390	MS-4503A – Storage Vessel																		
EQT0391	MF-4503B – Storage Vessel																		
EQT0392	KT - DADPM Rail Car/Truck Loading																		
EQT0393	GT-4501 – MDI 1 Cooling Tower																		1
EQT0394	GT-4528 – MDI 1 Cooling Tower																		1
EQT0395	GT-4938 – MDI 1 Cooling Tower																		1
EQT0396	MF-4503C – Storage Vessel																		
EQT0397	MF-4503D – Storage Vessel																		
EQT0398	MF-4503E – Storage Vessel																		
EQT0399	KZ – MI-50 Storage Tank MS-4968																		
EQT0400**	MA – MDI 2 Caustic Scrubber AS-6304B																		1
EQT0401	MF-6217A – Storage Vessel																		
EQT0402	MF-6217B – Storage Vessel																		
EQT0403	MF-4503H – Storage Vessel																		
EQT0404	MF-4503I – Storage Vessel																		
EQT0405	MF-6701A – Storage Vessel																		
EQT0406	MF-6701B – Storage Vessel																		
EQT0407	MF-6701A – Pure II Mixed Isomer Day Storage																		
EQT0408	MS-4917 – Storage Vessel																		3

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EQT0409	MS-4918 – Storage Vessel																				
EQT0410	MS-4919 – Storage Vessel																				
EQT0411	MF-4517 – Storage Vessel																				
EQT0412	MF-4518 – Storage Vessel																				
EQT0413	MH-1 – Storage Vessel MF-4519																				
EQT0414	MH-2 – MDI Reactor MR-4513																				
EQT0415	MK – Variants Storage Tank MF-4945																				
EQT0416	MM – MDI Bulk Tank MF-4503F																				
EQT0417	MN – MDI Bulk Tank MF-4503G																				
EQT0418	MF-8245A – Storage Vessel																				
EQT0419	MF-8245B – Storage Vessel																				
EQT0420	MQ – MDI Truck Loading/Unloading																				
EQT0421	MR – MDI Railcar Loading/Unloading																				
EQT0422	MU – MDI 2 Cooling Tower GT-6501																				
EQT0423	MW – Variants Reactor "D" MR-4841																				
EQT0424	MX – Variants Product Storage Tank MF-4503J																				
EQT0425	MF-4503K – Storage Vessel																				
EQT0426	MF-4503L – Storage Vessel																				
EQT0427	MS-6801 – Storage Vessel																				
EQT0428	MS-6802 – Storage Vessel																				
EQT0429	MS-6803 – Storage Vessel																				

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EQT0430	MS-6804 - Storage Vessel																			
EQT0431	MS-6805 - Storage Vessel																			
EQT0433	MS-6806 Storage Vessel																			1
EQT0434	MS-6807 Storage Vessel																		1	1
EQT0435	MS-6808 Storage Vessel																		1	1
EQT0436	MC-6810 Process Equipment																			
EQT0437	MS-6709 Storage Vessel																			
EQT0438	MS-6710 Storage Vessel																			
EQT0439	NN - Variants "C" Reactor MR-4901																3	2	1	
EQT0440	NO - Variants "A" Reactor MR-4816																3	2	1	
EQT0441	NP - Variants "B" Reactor MR-4840																3	2	1	
EQT0442	OE - Nitric Acid Cooling Tower GT-4528																		1	
EQT0443	ZB - MDI 3 Cooling Tower GT-8310																		1	
EQT0444**	ZE - MDI 1 Caustic Scrubber																		1	
EQT0445	MF-9217A - Storage Vessel																			
EQT0446	MF-9217B - Storage Vessel																			
EQT0447	MF-8245C - Storage Vessel																			
EQT0448	MF-8245D - Storage Vessel																			
EQT0449	ZI - MDI 2 Fume Scrubber AS-6303																		1	
EQT0450	ZK - MDI 2 DADPM Tank MF-6101																3			
EQT0451	ZM - MDI 3 Truck Loading/Unloading																2			

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EQT0452	ZN - MDI 3 Railcar Loading/Unloading							2													
EQT0453	ZO - Variants Reactor "F" MR-4842																				
EQT0454	ZP - Variants Product Storage Tank MF-4503 M											3					2	1			
EQT0455	ZQ - Pure 2 MI-30 Storage Tank MS-6716																				
EQT0456	MS-9703 - Storage Vessel																				
EQT0457	MS-9708 - Storage Vessel																				
EQT0458	MS-9709 - Storage Vessel																				
EQT0459	MS-9710 - Storage Vessel																				
EQT0460	MC-9700 - Process Equipment																				
EQT0461	MS-9711 - Storage Vessel																				
EQT0462	MS-9712 - Storage Vessel																				
EQT0463	ZT - Pure 3 Truck Loading/Unloading											3									
EQT0464	ZW - Variants CCP Product Storage Tank MF-4503 X																	3			
EQT0465	MC-4800 - Process Equipment																				
EQT0466	MS-4802A - Storage Vessel																				
EQT0467	MS-4802B - Surge Control Vessel																	1			
EQT0468	MS-4802C - Storage Vessel																				
EQT0469	MM-6110 - Storage Vessel																	1			
EQT0470	MS-6115 - Aniline/Water Separator																1				
EQT0471	MS-6118 - Storage Vessel																3				

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No. :	Description	LAC 33:III.Chapter																			
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0472	MS-6122 – Storage Vessel						3														1
EQT0473	MS-6158 – Storage Vessel						3														1
EQT0474	Z.A – MDI 3 Fume Scrubber AS-9303																				1
EQT0475	Z.V – Startup and Shutdown Emissions																				1
EQT0476	MF-6302A – HCl Storage Tank						3														1
EQT0477	MF-6302B – HCl Storage Tank						3														1
EQT0478	MF-6302C – HCl Storage Tank						3														1
EQT0479	MS-4302B – HCl Storage Tank						3														1
EQT0480	MS-4302C – HCl Storage Tank						3														1
EQT0481	MS-4302D – HCl Storage Tank						3														1
EQT0482	MS-4302E – HCl Storage Tank						3														1
EQT0483	MF-4302F – HCl Storage Tank						3														1
EQT0484	MF-4302G – HCl Storage Tank						3														1
EQT0485	MF-9302A – HCl Storage Tank						3														1
EQT0486	MF-9302B – HCl Storage Tank						3														1
EQT0487	MS-4101A – Formalin Day Tank						3														1
EQT0488	MS-4101B – Formalin Day Tank						3														1
EQT0489	MS-4210A – Receiver						3														1
EQT0490	MS-4210B – Receiver						3														1
EQT0491	MM-6551 – Refrigeration Compressor Drain						3														1
EQT0492	M-9551 – Refrigeration Compressor Drain						3														1

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ID No.:	Description	LAC 33:III. Chapter																			
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0493	MS-4240 - Compressor Drain						3														
EQT0494	MS-6552 - Refrigeration Receiver						3														
EQT0495	MS-9552 - Refrigeration Receiver						3														
EQT0496	PC-9316E - Refrigeration Receiver						3														
EQT0497	MF-4302A - HCl Day Storage						3											1			
EQT0510	MM-4406 - Chlorine Expansion Vessel						3											3			
EQT0512	MM-9406 - Chlorine Expansion Vessel						3											3			
EQT0513	MS-4304A - HCl Run Down						3											1			
EQT0514	GU-4103 - Graesser						3											1			
EQT0515	GU-6103 - Graesser						3											1			
EQT0516	MF-4108 - Unwashed DADPM Hold						3											1			
EQT0517	MF-6108 - Unwashed DADPM Hold						3											1			
EQT0518	MS-4212 - Concentrated Crude Storage						3											1			
EQT0521	MS-6701 - Precursor Feed Pot						3											1			
EQT0522	MS-9701 - Precursor Feed Pot						3											1			
EQT0523	MS-4800 - Demister						3											1			
EQT0524	MS-4801 - LUWA Bottoms Level						3											1			
EQT0525	MS-4856 - FFE Demister						3											1			
EQT0526	MS-4814 - Precursor Level Pot						3											1			
EQT0527	MS-4107 - Amine Brine Receiver						3											1			
EQT0528	MS-6107 - Amine Brine Receiver						3											1			
EQT0529	MS-6107B - Amine Brine Receiver						3											1			

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ID No. :	Description	LAC 33:III Chapter																			
		5 ▲	9	11	13	15	203	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0530	MF-4209A - MCB Storage																				
EQT0531	MF-4209B - MCB Storage																				
EQT0532	MF-6209A - MCB Storage	3																			
EQT0533	MF-6209B - MCB Storage	3																			
EQT0534	MF-9209A - MCB Storage	3																			
EQT0535	MF-9209B - MCB Storage	3																			
EQT0536	MS-4155 - Settling Feed Tank	3																			
EQT0537	MS-6155 - Settling Feed Tank	3																			
EQT0538	MM-4104 - Graesser Washer Weir Pot	3																			
EQT0539	MM-6104 - Graesser Washer Weir Pot	3																			
EQT0540	MM-4105 - Extractor Weir Pot	3																			
EQT0541	MM-6105 - Extractor Weir Pot	3																			
EQT0542	MM-4106 - Amine Water/Aniline Separator Weir Box	3																			
EQT0543	MM-6106 - Amine Water/Aniline Separator Weir Box	3																			
EQT0544	MS-4402 - Economizer	3																			
EQT0548	MS-4109 - DADPM Buffer	3																			
EQT0549	MS-6109 - DADPM Buffer	3																			
EQT0550	MS-4110 - Decanter	3																			
EQT0551	MS-6110 - Decanter	3																			
EQT0553	MS-4212 - Conc. Crude Storage	3																			
EQT0554	MS-6212 - Conc. Crude Storage	3																			

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ID No.:	Description	LAC 33:III Chapter																			
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EQT0555	MS-9212 – Conc. Crude Storage						3														1
EQT0556	MS-4162 – Reflux							1													1
EQT0557	MS-6162 – Reflux							1													1
EQT0558	MS-4154 – Vacuum Pump Receiver						3														1
EQT0559	MS-6154 – Vacuum Pump Receiver						3														1
EQT0560	MS-4214 – Conc. Column Reflux						3														1
EQT0561	MS-6214 – Conc. Column Reflux						3														1
EQT0562	MS-9214 – Conc. Column Reflux						3														1
EQT0563	MS-6245 – PI Stripper Reflux						3														1
EQT0564	MS-4157 – Extractor Level Control						3														1
EQT0565	MS-6157 – Extractor Level Control						3														1
EQT0567	MS-4159 Amine Brine Buffer Tank						3														1
EQT0568	MS-6159 Amine Brine Buffer Tank						3														1
EQT0569	MS-4207 – Phosgene Mixing Vessel						1														1
EQT0570	MS-4404 – Phosgene Absorber						1														1
EQT0571	Emergency Storage																				1
EQT0572	MS-6310 – Phosgene Absorber						1														1
EQT0573	MS-4403 – Phosgene Level Pot						1														1
EQT0574	MS-4211 – Recovery Column Feed						1														1
EQT0575	MS-6211 – Recovery Column Feed						1														1

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ID No. :	Description	LAC 33.III.Chapter																			
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56.	59
EQT0576	MS-9211 - Recovery Column Feed																				1
EQT0577	MS-9704 - Hot MCB Circulation Tank																				1
EQT0578	MR-6207 - PI1 Batch Reactor																				1
EQT0579	MR-4201 MDI 1 Phosgenation Reactor Operation																				1
EQT0580	MR-4202 MDI 1 Phosgenation Reactor Operation																				1
EQT0581	MR-4203 MDI 1 Phosgenation Reactor Operation																				1
EQT0582	MR-4204 MDI 1 Phosgenation Reactor Operation																				1
EQT0583	MR-6201 MDI 2 Phosgenation Reactor Operation																				1
EQT0584	MR-6202 MDI 2 Phosgenation Reactor Operation																				1
EQT0585	MR-6203 MDI 2 Phosgenation Reactor Operation																				1
EQT0586	MR-6204 MDI 2 Phosgenation Reactor Operation																				1
EQT0587	MR-4401A - Phosgene Reactor Operation																				1
EQT0588	MR-4401B - Phosgene Reactor Operation																				1
EQT0589	MR-4401C - Phosgene Reactor Operation																				1
EQT0590	MR-4401D - Phosgene Reactor Operation																				1
EQT0591	MR-4105A - MDI 1 DADPM Batch Operation																				1

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ID No :	Description	LAC 33:III Chapter																	
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*51*	56
EQT0592	MR-4105B – MDI 1 DADPM Batch Operation															3	2	2	1
EQT0593	MR-4106 – MDI 1 – Neutralizer															3	2	2	1
EQT0594	MR-4210 – Fixed Bed Reactor 1A															3	1		1
EQT0596	MR-6105A – MDI 2 DADPM Batch Operation															3	2	1	1
EQT0597	MR-6105B – MDI 2 DADPM Batch Operation															3	2	1	1
EQT0598	MR-6105C – MDI 2 DADPM Batch Operation															3	2	1	1
EQT0599	MR-6105D – MDI 2 DADPM Batch Operation															3	2	1	1
EQT0600	MR-6105E – MDI 2 DADPM Continuous Operation															3	2	1	1
EQT0601	MR-6105F – MDI 2 DADPM Continuous Operation															3	2	1	1
EQT0602	MR-6106 – Neutralizer Reactor Operation															3	2		1
EQT0603	MR-6016C – Neutralizer Reactor Operation															3	2		1
EQT0604	MR-6107 – Neutralizer Reactor Operation															3	2		1
EQT0605	MR-9201 – MDI 3 Phosgenation Reactor Operation															3	2		1
EQT0606	MR-9202 – MDI 3 Phosgenation Reactor Operation															3	2		1
EQT0607	MR-9203 – MDI 3 Phosgenation Reactor Operation															3	2		1
EQT0608	MR-9204 – MDI 3 Phosgenation Reactor Operation															3	2		1

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		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0609	MR-9401A – Phosgene Reactor Operation										-3										
EQT0610	MR-9401B – Phosgene Reactor Operation										3		2								1
EQT0611	MR-9401C – Phosgene Reactor Operation										3		2								1
EQT0612	AS-4101 – DAIDPM Stripper Distillation Column										3		2								1
EQT0613	AS-4103 – Amine Brine Stripper										3		2								1
EQT0614	AS-4104 – Methanol Fractionator										3		2								1
EQT0615	AS-4800 – Pure 1 Splitting Distillation Column										3		2								1
EQT0616	AS-6701 – Pure 2 Splitting Distillation Column										3		2								1
EQT0617	AS-6205 – PI Stripper Column										3		2								1
EQT0618	AS-6202 – MDI Purification Distillation Column										3		2								1
EQT0619	AS-6203 – MDI Purification Distillation Column										3		2								1
EQT0620	AS-6201 – MDI 2 Recovery Distillation Column										3		2								1
EQT0621	MS-6210 – MDI 2 Recovery Distillation Column										3		2								1
EQT0622	AS-6301 – MDI 2 Phosgene Absorber										3		2								1
EQT0623	AS-4201 – MDI 1 MCB Recovery Distillation Column										3		2								1
EQT0624	MS-4210 – MDI 1 MCB Recovery Distillation Column										3		2								1

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		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0625	AS-4301 – MDI Phosgene Absorber Column																				
EQT0626	AS-4202 – MDI 1 Purification Distillation Column																				
EQT0627	AS-4203 – MDI 1 Phosgene Absorber Column																				
EQT0628	AS-6101 – DADPM 2 DADPM Stripper Distillation Column																				
EQT0629	AS-6103 – Effluent Recovery Distillation Column																				
EQT0630	AS-6104 – Effluent Recovery Distillation Column																				
EQT0632	AS-9201 – MDI 3 MCB Recovery Distillation Column																				
EQT0633	MS-9210 – MDI 3 MCB Recovery Distillation Column																				
EQT0634	AS-9301 – MDI 3 Phosgene Absorber Column																				
EQT0635	AS-9202 – MDI 3 MDI Purification Distillation Column																				
EQT0636	AS-9203 – MDI 3 MDI Purification Distillation Column																				
EQT0637	AS-9702 – Pure 3 Lights Removal Column																				
EQT0638	AS-9701 – Heavies Removal Column																				
EQT0639	AS-9204 – HCl Clean-up Column																				
EQT0640	MS-4216 – MDI Cooler																				
EQT0641	MDI HCl Loading																				

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		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22•	29•	51•	56
EQT0642	MS-6216 - MDI Cooler																			1
EQT0652	GU-4104 - Effluent Extractor																			1
EQT0653	GU-6104 - Effluent Extractor																			1
EQT0656	HCI Tank Truck/Railcar Loading																			1
EQT0657	TT-4211A - Economizer																			1
EQT0658	TT-4211B - Economizer																			1
EQT0659	GY-4110 - In-line Water Heater																			1
EQT0660	GY-6110 - In-line Water Heater																			1
EQT0661	TT-4829 - Tempered Water Cooler																			1
EQT0662	TT-4831 - Variants Reactor Water Cooler																			1
EQT0663	TT-4841 - Variants Reactor Water Cooler																			1
EQT0664	TT-4214A - Pump Out Unit Condenser																			1
EQT0665	TT-4214B - Pump Out Unit Condenser																			1
EQT0666	TT-6550 - Pump Out Unit Condenser																			1
EQT0667	TT-6551 - Refrigeration Condenser																			1
EQT0668	TT-6552 - Refrigeration Economizer																			1
EQT0669	TT-4859 - 1 st Surface Condenser																			1
EQT0670	TT-4860 - 2 nd Surface Condenser																			1
EQT0671	TT-4861 - 3 rd Surface Condenser																			1
EQT0672	TT-4863 - Variants Reactor F Cooler and Heater																			1

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		5*	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0673	TT-4864 – Variants Reactor F Cooler and Heater																			
EQT0674	TT-9705 – Tempered Water Cooler																			
EQT0675	TT-9707 – Crystallizer HTM Heater																			
EQT0676	TT-9320 – HCl Compressor Lube Oil Cooler																			
EQT0677	TT-4832 – Water System Exchanger																			
EQT0678	TT-4946 – 2 nd Blender Water Cooler																			
EQT0679	TT-4404A – Phosgene Reactor Cooler																			
EQT0680	TT-4404B – Phosgene Reactor Cooler																			
EQT0681	TT-4404C – Phosgene Reactor Cooler																			
EQT0682	TT-4404D – Phosgene Reactor Cooler																			
EQT0683	TT-9404A – Phosgene Reactor Cooler																			
EQT0684	TT-9404B – Phosgene Reactor Cooler																			
EQT0685	PC-9316D – Refrigeration System Condenser																			
EQT0686	PC-9316F – Economizer																			
EQT0687	PC-9316J – Oil Cooler																			
EQT0688	PC-9316P – Oil Cooler																			
EQT0689	TT-4302 – HCl Absorber Condenser																1			
EQT0690	TT-4302S – HCl Absorber Condenser																1			
EQT0691	TT-6302A – HCl Absorber Condenser																1			
EQT0692	TT-6302B – HCl Absorber Condenser																1			

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ID No. :	Description	LAC 33:II.Chapter																		
		5*	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0693	TT-9302A - HCl Absorber Condenser																			
EQT0694	TT-9302S - HCl Absorber Condenser																			
EQT0695	TT-6309 - HCl Concentrator																			
EQT0696	TT-9309 - HCl Concentrator																			
EQT0697	TT-4303A - HCl Absorber Bottoms Cooler																			
EQT0698	TT-4303B - HCl Absorber Bottoms Cooler																			
EQT0699	TT-6303A - HCl Absorber Bottoms Cooler																			
EQT0700	TT-6303B - HCl Absorber Bottoms Cooler																			
EQT0701	TT-9303A - HCl Absorber Bottoms Cooler																			
EQT0702	TT-9303B - HCl Absorber Bottoms Cooler																			
EQT0703	TT-9318 - HCl Clean-up Column Condenser																			
EQT0719	TT-6709 - Tempered Water Cooler																			
EQT0720	GY-6701 - Hot Water Heater																			
EQT0721	TT-6708 - Hot Water Cooler																			
EQT0722	GY-6702 - Tempered Water Heater																			
EQT0723	TT-9311 - Flume Scrubber Circulation Cooler																			
EQT0724	TT-9703 - Distillate Cooler																			
EQT0725	TS-4112 - Seal Flush Tank Coil Plate																			

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		5*	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0726	GJ-6701 – Condenser for Ejectors																			1
EQT0727	GJ-6702 – Condenser for Ejectors																			1
EQT0728	GJ-6703 – Condenser for Ejectors																			1
EQT0729	TT-6704 – Pure MDI Condenser																			1
EQT0730	GJ-6705 – Condenser for Ejectors																			1
EQT0731	GJ-6706 – Condenser for Ejectors																			1
EQT0732	GJ-6707 – Condenser for Ejectors																			1
EQT0733	GJ-6708 – Condenser for Ejectors																			1
EQT0734	GJ-6709 – Condenser for Ejectors																			1
EQT0735	GJ-6710 – Condenser for Ejectors																			1
EQT0736	TT-4106 – DA DPM Stripper Condenser																			1
EQT0737	TT-6106 – DA DPM Stripper Condenser																			1
EQT0738	TT-4121 – Amine Water/Aniline Cooler																			1
EQT0739	TT-6121 – Amine Water/Aniline Cooler																			1
EQT0740	TT-4122 – MeOH Condenser																			1
EQT0741	TT-6122 – MeOH Condenser																			1
EQT0742	TT-4125 – Vacuum Pump Liquid Cooler																			1
EQT0743	TT-6125 – Vacuum Pump Liquid Cooler																			1
EQT0745	TT-4127 – Neutralizer Vent Condenser																			1
EQT0746	TT-6104 – Neutralizer Vent Condenser																			1
EQT0747	TT-6104C – Neutralizer Vent Condenser																			1

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		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0748	TT-4260 – Recovery Column Offgas Condenser																				
EQT0749	TT-6260 – Recovery Column Offgas Condenser																				
EQT0750	TT-4102A – Reactor Vent Condenser																				
EQT0751	TT-4102B – Reactor Vent Condenser																				
EQT0752	TT-4802 – Distillate Cooler																				
EQT0753	TT-4803 – Distillate Condenser																				
EQT0754	TT-4804 – 1 st Guard Condenser																				
EQT0755	TT-6703 – Mixed Isomer Condenser																				
EQT0757	TT-6706 – Mixed Isomer Cooler																				
EQT0758	TT-4805A – 2 nd Guard Condenser																				
EQT0759	Dissocrystallizer Bundle																				
EQT0760	TT-4119 – DADPM Stripper Bottoms Cooler																				
EQT0761	TT-6119 – DADPM Stripper Bottoms Cooler																				
EQT0762	TT-4128 – MeOH Bottoms Cooler																				
EQT0763	TT-6128 – MeOH Bottoms Cooler																				
EQT0764	TT-6102A – DADPM Reactor Vent Condenser																				
EQT0765	TT-6102B – DADPM Reactor Vent Condenser																				
EQT0766	TT-6102C – DADPM Reactor Vent Condenser																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No. :	Description	LAC 33:III Chapter																		
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0767	TT-6102D – DADPM Reactor Vent Condenser																			1
EQT0768	TT-6102E – DADPM Reactor Vent Condenser																			1
EQT0769	TT-6102F – DADPM Reactor Vent Condenser																			1
EQT0776	TT-4207 – MCB Cooler																			1
EQT0777	TT-6207 – MCB Cooler																			1
EQT0778	TT-9207 – MCB Cooler																			1
EQT0779	TT-9704 – MCB Cooler																			1
EQT0780	TT-9260 – Recovery Column Off Gas Condenser																			1
EQT0781	TT-9315A – HCl Compressor 1 st Intercooler																			1
EQT0782	TT-9315B – HCl Compressor 2 nd Intercooler																			1
EQT0783	TT-9316 – HCl Compressor Aftercooler																			1
EQT0785	TT-4213 – Product Cooler																			1
EQT0786	TT-6276 – Product Cooler																			1
EQT0787	TT-9276 – Product Cooler																			1
EQT0788	TT-4509 – EDMI Reactor Cooler																			1
EQT0789	TT-4801A – Crash Cooler																			1
EQT0790	TT-4801S – Crash Cooler																			1
EQT0791	TT-4101A – DADPM Reactor Cooler																			1
EQT0792	TT-4101B – DADPM Reactor Cooler																			1

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
 RUBICON LLC
 GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table I. Applicable Louisiana and Federal Air Quality Requirements

ID No. :	Description	LAC 33.III.Chapter																		
		5♦	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22♦	29♦	51♦	56
EQT0793	TT-6101A - DADPM Reactor Cooler																			1
EQT0794	TT-6101B - DADPM Reactor Cooler																			1
EQT0795	TT-6101C - DADPM Reactor Cooler																			1
EQT0796	TT-6101D - DADPM Reactor Cooler																			1
EQT0797	TT-6101E - DADPM Reactor Cooler																			1
EQT0798	TT-6101F - DADPM Reactor Cooler																			1
EQT0799	TT-4401 - Phosgene Reactor Condenser																			1
EQT0800	TT-9401 - Phosgene Reactor Condenser																			1
EQT0801	TT-6311 - Fume Scrubber Cooler																			1
EQT0803	TT-9722 - 3 rd Stage Condenser																			1
EQT0804	TT-9723 - 4 rd Stage Condenser																			1
EQT0805	TT-9724 - 5 th Stage Condenser																			1
EQT0806	TT-4241 - Condensate Cooler																			1
EQT0807	TT-4247 - Solvent Wash Cooler																			1
EQT0808	TT-4250 - DADPM Cooler																			1
EQT0809	TT-4251 - Reactor Intercooler																			1
EQT0810	TT-4252 - IC2 Intercooler																			1
EQT0811	TT-4253 - Pilot Plant Vent Condenser																			1
EQT0813	GR-4221A - Suction Separator KO																			3
EQT0814	MM-4301 - HCl Absorber Cond. KO																			3
EQT0815	MM-4303 - HCl Absorber Cond. KO																			3
EQT0816	MM-6301 - HCl Absorber Cond. KO																			3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**MDI PLANT; AI No. 1468; PER2008019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III. Chapter																		
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0817	PC-9316G – Refrigeration System Suction KO																			
EQT0818	MM-4304 – Caustic Scrubber Heater KO																			
EQT0819	MM-6304 – Caustic Scrubber Heater KO																			
EQT0820	MM-9304 – Caustic Scrubber Heater KO																			
EQT0821	MS-4205 – Reactor Air Cond. Separator KO																			
EQT0822	MS-6205 – Reactor Air Cond. Separator KO																			
EQT0823	MS-9205 – Reactor Air Cond. Separator KO																			
EQT0824	MS-4229 – Vacuum Pump Separator KO																			
EQT0825	MS-6229 – Vacuum Pump Separator KO																			
EQT0826	MS-9229 – Vacuum Pump Separator KO																			
EQT0827	MS-6702 – MCB Flash KO																			
EQT0828	MS-6150 – DADPM Reaction Vent KO																			
EQT0829	MS-4309 – Phosgene Absorber KO																			
EQT0830	MS-6309 – Phosgene Absorber KO																			
EQT0831	MS-9309 – Phosgene Absorber KO																			
EQT0832	MS-9315 – HCl Compressor Suction KO																			
EQT0834	MM-4204 – Vacuum Pump Carbate Cooler																			
EQT0835	MM-6204 – Vacuum Pump Separator KO																			
EQT0836	MM-4108 – OH Cond. KO																			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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RUBICON LLC
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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0837	MM-6201 – Rec. Col. KO																			
EQT0838	MM-6202 – Rec. Col. KO																			
EQT0839	MM-K10 – Off Gas Cond.																			
EQT0840	MM-K10A – Rec. Column KO Vessel																			
EQT0841	MM-6305 – Rec. Column KO Vessel																			
EQT0842	PE-315 – Rec. Column KO Vessel																			
EQT0843	PE-9315 – Phosgene Analyzer KO																			
EQT0844	MM-9201 – MCB Recovery Column KC																			
EQT0845	MM-9202 – MCB Recovery Column KC																			
EQT0846	MS-9228 – Concentrator Column Feed Flash Drum																			
EQT0847	MM-K5 – Dechlo. Cond. Separator KO																			
EQT0848	MS-9243A – Dechlorinator Condenser Separator																			
EQT0849	MS-9243B – Dechlorinator Condenser Separator																			
EQT0850	MM-9301 – HCl Absorber KO																			
EQT0851	MM-9303 – HCl Absorber KO																			
EQT0852	MM-6303 – HCl Absorber Cond. KO																			
EQT0853	MS-6228 – Conc. Feed Flash Drum																			
EQT0854	MS-4243 – Conc. Feed Flash Drum																			
EQT0855	MS-6243A – Conc. Feed Flash Drum																			
EQT0856	MS-6243B – Conc. Feed Flash Drum																			

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**MDI PLANT; AI No. 1468; PER20080019
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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III, Chapter																			
		5*	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
EQT0857	MS-4228 - Conc. Col. Flash Feed KO																				
EQT0858	MS-4150 - DADPM Reaction Vent KO																				
EQT0859	MM-9204 - Vacuum Pump Separator Cond. KO																				
EQT0860	MS-6551 - Vacuum Pump Separator Cond. KO																				
EQT0861	MS-9551 - Vacuum Pump Separator Cond. KO																				
EQT0864	MS-4156 Amine Water/Aniline Separator																				
EQT0865	MS-6156 Amine Water/Aniline Separator																				
EQT0896	AS-6117 A - DADPM Continuous Isomerization Column																				1
EQT0897	AS-6117 B - DADPM Continuous Isomerization Column																				1
EQT0898	AS-6112 - CDU HCl Absorber Column																				1
EQT0899	MM-6122 - Neutralizer Separator Weir Box																				1
EQT0900	MR-6111 - CDU Feed Drum																				1
EQT0901	MR-6124 - Neutralizer																				1
EQT0902	MS-6121 - Neutralizer Separator																				1
EQT0903	TT-6116A - CDU Cooler																				1
EQT0904	TT-6116B - CDU Cooler																				1
EQT0905	TT-6116C - CDU Cooler																				1
EQT0906	TT-6116D - CDU Cooler																				1

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RUBICON LLC

GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No. :	Description	LAC 33:III.Chapter																		
		5▲	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56
EQT0907	TT-9XXX - Secondary refrigeration Condenser																			
EQT0908	AS-4302 - MDI 1 HCl Absorber																			1
EQT0909	AS-6302 - MDI 2 HCl Absorber																		1	
EQT0910	AS-9302 - MDI 3 HCl Absorber																		1	
EQT0911	MS-4302A - HCl Day Tank																			1
EQT1193	IQ - HCl Scrubber AS-5401	-																	1	
EQT1194	MF-571A - HCl Storage Tank MF-571A																		1	
EQT1195	MF-572A - HCl Storage Tank MF-572A																		1	
EQT1196	MF-573A - HCl Storage Tank MF-573A																		1	
EQT1197	Loading - HCl Tank Truck Loading																		1	
EQT1198	MF-571B - HCl Storage Tank																		1	
EQT1199	MF-572B - HCl Storage Tank																		1	
EQT1200	MF-573B - HCl Storage Tank																		1	
FUG020	KS - MDI Plant Fugitive Emissions																		1	
FUG021	ZU - Wastewater System Fugitives																	2		1
RLP032	KD - MDI Test Tanks Vent																			
RLP033	KF - MDI 1 Aniline Storage Vent Seal Pot MMK1A																			
RLP034	KH - MDI 1 DADPM Tanks Vent																			
RLP035	KQ - MDI Bulk Tank Common Vent 1																			

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RUBICON LLC

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ID No.:	Description	LAC 33:III Chapter																			
		5*	9	11	13	15	2103	2107	2109	2111	2113	2115	2122	2147	2149	2153	22*	29*	51*	56	59
RLP036	KV – MDI Bulk Tanks Common Vent 2																				
RLP037	MB – MDI 2 Test Tanks Vent																				
RLP038	MC – MDI Bulk Tanks Common Vent 3																				
RLP039	MD – Pure 2 MDI Day Tanks Vent																				
RLP040	MG – Variants Storage Common Vent 1																				
RLP041	MH – Variants Storage Common Vent 2																				
RLP042	MO – MDI Inventory Tanks Common Vent 1																				
RLP043	MY – Variants Product Storage Common Vent 1																				
RLP044	NB – Pure 2 Crystallizer Tank Vent																				
RLP045	NC – Pure 2 Crystallizer Heat Transfer Tanks Vent																				
RLP046	ND – Pure 2 Distillate Hold and Test Tanks Vent																				
RLP047	ZF – MDI 3 Test Tanks Vent																				
RLP048	ZH – MDI 3 Inventory Tanks Vent																				
RLP049	ZR – Distillate & Product Storage Tanks Vent																				
RLP050	ZS – Pure MDI/MI-20 Storage Tank Vent																				
RLP051	KI – Pure 1 Distillate Vent																				
RLP052	ZL – DADPM 2 Storage Vessel and Separation Weir Vent																				

* The regulations indicated above are State Only regulations.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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RUBICON LLC

GEISMAR, ASCENSION PARISH, LOUISIANA

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019

RUBICON LLC

GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60												40 CFR 61												40 CFR 63												
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82								
UNF006	MDI Plant	1												1	1	1	1	1								3	1	1										
EQT0369	KB - MDI 1 Fume Scrubber AS-4303A																																					
EQT0370	KC - MDI 1 Caustic Scrubber AS-4304B																																					
EQT0371	MS-4217A - Storage Vessel																																					
EQT0372	MS-4217B - Storage Vessel																																					
EQT0373	MS-4217C - Storage Vessel																																					
EQT0374	MS-4906 - Storage Vessel																																					
EQT0375	MF-4118 - Storage Vessel																																					
EQT0376	MM-4110 - Aniline/Water Weir Box																																					
EQT0377	MS-4115 - Aniline/Water Separator																																					
EQT0378	MS-4118 - Wash Water Feed																																					
EQT0379	MS-4121 - Wet Aniline Storage																																					
EQT0380	MS-4122 - DADPM Stripper Overhead Seal Pot Tank																																					
EQT0381	MS-4158 - Amine Water Pump Out Pot																																					
EQT0382	KG - MDI 1 Ammonia Solution Tank MF-4512																																					
EQT0383	MF-4223 - Storage Vessel																																					
EQT0384	MS-4112A - Storage Vessel																																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82																			
EQT0385	MS-4112B - Storage Vessel									3																																							
EQT0386	MS-4112C - Storage Vessel									3																																							
EQT0387	MS-4112D - Storage Vessel									3																																							
EQT0388	KJ - Pure 1 Bulk Tank									3																																							
EQT0389	MS-4910																																																
EQT0390	KK - Pure 1 Mother Liquor Bulk Tank MS-4913									3																																							
EQT0391	MS-4503A - Storage Vessel									3																																							
EQT0392	MF-4503B - Storage Vessel																																																
EQT0393	KT - DADPM Rail Car/Truck Loading																																																
EQT0394	GT-4501 - MDI 1 Cooling Tower																																																
EQT0395	GT-4528 - MDI 1 Cooling Tower																																																
EQT0396	GT-4938 - MDI 1 Cooling Tower																																																
EQT0397	MF-4503C - Storage Vessel																																																
EQT0398	MF-4503D - Storage Vessel																																																
EQT0399	MF-4503E - Storage Vessel																																																
EQT0400	KZ - MI-50 Storage Tank																																																
EQT0401	MA - MDI 2 Caustic Scrubber AS-6304B																																																
EQT0402	MF-6217A - Storage Vessel																																																
EQT0403	MF-6217B - Storage Vessel																																																
EQT0404	MF-6217C - Storage Vessel																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63																		
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82														
EQT0404	MF-4503I – Storage Vessel									3																																		
EQT0405	MF-6701A – Storage Vessel									3																																		
EQT0406	MF-6701B – Storage Vessel									3																																		
EQT0407	MF-6703A – Pure II Mixed Isomer Day Storage									3																																		
EQT0408	MS-4917 – Storage Vessel									3																																		
EQT0409	MS-4918 – Storage Vessel									3																																		
EQT0410	MS-4919 – Storage Vessel									3																																		
EQT0411	MF-4517 – Storage Vessel									3																																		
EQT0412	MF-4518 – Storage Vessel									3																																		
EQT0413	MH-1 – Storage Vessel									3																																		
EQT0414	MH-2 – EMDI Reactor																		2																									
EQT0415	MR-4513																																											
EQT0416	MK – Variants Storage Tank MF-4945									3																																		
EQT0417	MM – MDI Bulk Tank MF-4503F									3																																		
EQT0418	MN – MDI Bulk Tank MF-4503G									3																																		
EQT0419	MQ – MDI Truck MF-8245A – Storage Vessel									3																																		
EQT0420	MR – MDI Railcar Loading/Unloading									3																																		
EQT0421	MR – MDI Loading/Unloading									3																																		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**MDI PLANT; AI No. 1468; PER#0080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA**

Table 1. Applicable Louisiana and Federal Air Quality Requirements

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82							
EQT0442	OE - Nitric Acid Cooling Tower GT-4528																																				
EQT0443	ZB - MDI 3 Cooling Tower GT-8310																																				
EQT0444**	ZE - MDI 1 Caustic Scrubber																																				
EQT0445	MF-9217A - Storage Vessel																																				
EQT0446	MF-9217B - Storage Vessel																																				
EQT0447	MF-8245C - Storage Vessel																																				
EQT0448	MF-8245D - Storage Vessel																																				
EQT0449	ZI - MDI 2 Fume Scrubber AS-6303																																				
EQT0450	ZK - MDI 2 DADPM Tank MF-6101																																				
EQT0451	ZM - MDI 3 Truck Loading/Unloading																																				
EQT0452	ZN - MDI 3 Railcar Loading/Unloading																																				
EQT0453	ZO - Variants Reactor "F" MR-4842																																				
EQT0454	ZP - Variants Product Storage Tank MF-4503 M																																				
EQT0455	ZQ - Pure 2 MI-30 Storage Tank MS-6716																																				
EQT0456	MS-9703 - Storage Vessel																																				
EQT0457	MS-9708 - Storage Vessel																																				
EQT0458	MS-9709 - Storage Vessel																																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
		A	D	Da	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82																				
EQT0459	MS-9710 - Storage Vessel																																																
EQT0460	MC-9700 - Process Equipment																																																
EQT0461	MS-9711 - Storage Vessel																																																
EQT0462	MS-9712 - Storage Vessel																																																
EQT0463	ZT - Pure 3 Truck Loading/Unloading																																																
EQT0464	ZW - Variants CCP Product Storage Tank MF-4503X																																																
EQT0465	MC-4800 - Process Equipment																																																
EQT0466	MS-4802A - Storage Vessel																																																
EQT0467	MS-4802B - Surge Control Vessel																																																
EQT0468	MS-4802C - Storage Vessel																																																
EQT0469	MM-6110 - Storage Vessel																																																
EQT0470	MS-6115 - Aniline/Water Separator																																																
EQT0471	MS-6118 - Storage Vessel																																																
EQT0472	MS-6122 - Storage Vessel																																																
EQT0473	MS-6158 - Storage Vessel																																																
EQT0474	ZA - MDI 3 Fume Scrubber AS-9303																																																
EQT0475	ZV - Startup and Shutdown Emissions																																																
EQT0476	MF-6302A - HCl Storage Tank																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82							
EQT0477	MF-6302B- HCl Storage Tank																																				
EQT0478	MF-6302C- HCl Storage Tank																																				
EQT0479	MS-4302B - HCl Storage Tank																																				
EQT0480	MS-4302C - HCl Storage Tank																																				
EQT0481	MS-4302D - HCl Storage Tank																																				
EQT0482	MS-4302E - HCl Storage Tank																																				
EQT0483	MF-4302F - HCl Storage Tank																																				
EQT0484	MF-4302G - HCl Storage Tank																																				
EQT0485	MF-9302A - HCl Storage Tank																																				
EQT0486	MF-9302B - HCl Storage Tank																																				
EQT0487	MS-4101A - Fomalin Day Tank																																				
EQT0488	MS-4101B - Fomalin Day Tank																																				
EQT0489	MS-4210A - Receiver																																				
EQT0490	MS-4210B - Receiver																																				
EQT0491	MM-6551 - Refrigeration Compressor Drain																																				

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82								
EQT0492	MM-9551 - Refrigeration Compressor Drain																																					
EQT0493	MS-4240 - Compressor Drain																																					
EQT0494	MS-6552 - Refrigeration Receiver																																					
EQT0495	MS-9552 - Refrigeration Receiver																																					
EQT0496	PC-9316E - Refrigeration Receiver																																					
EQT0497	MF-4302A - HCl Day Storage																																					
EQT0510	MM-4406 - Chlorine Expansion Vessel																																					
EQT0512	MM-9406 - Chlorine Expansion Vessel																																					
EQT0513	MS-4304A - HCl Run Down																																					
EQT0514	GU-4103 - Graesser																																					
EQT0515	GU-6103 - Graesser																																					
EQT0516	MF-4108 - Unwashed DADPM Hold																																					
EQT0517	MF-6108 - Unwashed DADPM Hold																																					
EQT0518	MS-4212 - Concentrated Crude Storage																																					
EQT0521	MS-6701 - Precursor Feed Pot																																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 63												40 CFR					
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82	
EQT0522	MS-9701 – Precursor Feed Pot																														
EQT0523	MS-4800 – Demister																														
EQT0524	MS-4801 – LUJWA Bottoms Level																														
EQT0525	MS-4856 – FFE Demister																														
EQT0526	MS-4814 – Precursor Level Pot																														
EQT0527	MS-4107 – Amine Brine Receiver																														
EQT0528	MS-6107 – Amine Brine Receiver																														
EQT0529	MS-6107B – Amine Brine Receiver																														
EQT0530	MF-4209A – MCB Storage																														
EQT0531	MF-4209B – MCB Storage																														
EQT0532	MF-6209A – MCB Storage																														
EQT0533	MF-6209B – MCB Storage																														
EQT0534	MF-9209A – MCB Storage																														
EQT0535	MF-9209B – MCB Storage																														
EQT0536	MS-4155 – Settling Feed Tank																														
EQT0537	MS-6155 – Settling Feed Tank																														
EQT0538	MM-4104 – Graesser Washer Weir Pot																														

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
 RUBICON LLC
 GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82								
EQT0539	MM-6104 - Grasser Washer Weir Pot																																					
EQT0540	MM-4105 - Extractor Weir Pot																																					
EQT0541	MM-6105 - Extractor Weir Pot																																					
EQT0542	MM-4106 - Amine Water/Aniline Separator Weir Box																																					
EQT0543	MM-6106 - Amine Water/Aniline Separator Weir Box																																					
EQT0544	MS-4402 - Economizer																																					
EQT0548	MS-4109 - DADPM Buffer																																					
EQT0549	MS-6109 - DADPM Buffer																																					
EQT0550	MS-4110 - Decanter																																					
EQT0551	MS-6110 - Decanter																																					
EQT0553	MS-4212 - Conc. Crude Storage																																					
EQT0554	MS-6212 - Conc. Crude Storage																																					
EQT0555	MS-9212 - Conc. Crude Storage																																					
EQT0556	MS-4162 - Reflux																																					
EQT0557	MS-6162 - Reflux																																					
EQT0558	MS-4154 - Vacuum Pump Receiver																																					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019

RUBICON LLC

GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82							
EQT0559	MS-6154 – Vacuum Pump Receiver									3																											
EQT0560	MS-4214 – Conc. Column Reflux									3																											
EQT0561	MS-6214 – Conc. Column Reflux									3																											
EQT0562	MS-9214 – Conc. Column Reflux									3																											
EQT0563	MS-6245 – PI Stripper Reflux									3																											
EQT0564	MS-4157 – Extractor Level Control									3																											
EQT0565	MS-6157 – Extractor Level Control									3																											
EQT0567	MS-4159 Amine Brine Buffer Tank									3																											
EQT0568	MS-6159 Amine Brine Buffer Tank									3																											
EQT0569	MS-4207 – Phosgene Mixing Vessel									3																											
EQT0570	MS-4404 – Phosgene Absorber Emergency Storage									3																											
EQT0571	MS-6310 – Phosgene Absorber Emergency Storage									3																											

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82																			
EQT0572	MS-9310 – Phosgene Absorber Emergency Storage																																																
EQT0573	MS-4403 – Phosgene Level Pot																																																
EQT0574	MS-4211 – Recovery Column Feed																																																
EQT0575	MS-6211 – Recovery Column Feed																																																
EQT0576	MS-9211 – Recovery Column Feed																																																
EQT0577	MS-9704 – Hot MCB Circulation Tank																																																
EQT0578	MR-6207 – PI Batch Reactor																																																
EQT0579	MR-4201 MDI 1 Phosgenation Reactor Operation																																																
EQT0580	MR-4202 MDI 1 Phosgenation Reactor Operation																																																
EQT0581	MR-4203 MDI 1 Phosgenation Reactor Operation																																																
EQT0582	MR-4204 MDI 1 Phosgenation Reactor Operation																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	NNNNN	64	65	68	82						
EQT0583	MR-6201 MDI 2 Phosgenation Reactor Operation													3																							
EQT0584	MR-6202 MDI 2 Phosgenation Reactor Operation													3																							
EQT0585	MR-6203 MDI 2 Phosgenation Reactor Operation													3																							
EQT0586	MR-6204 MDI 2 Phosgenation Reactor Operation													3																							
EQT0587	MR-4401A – Phosgene Reactor Operation													2																							
EQT0588	MR-4401B – Phosgene Reactor Operation													2																							
EQT0589	MR-4401C – Phosgene Reactor Operation													2																							
EQT0590	MR-4401D – Phosgene Reactor Operation													2																							
EQT0591	MR-4105A – MDI 1 DADPM Batch Operation													2																							
EQT0592	MR-4105B – MDI 1 DADPM Batch Operation													2																							
EQT0593	MR-4106 – MDI 1 – Neutralizer													2																							
EQT0594	MR-4210 – Fixed Bed Reactor 1A													3																							

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**MDI PLANT; AI No. 1468; PER20030019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR													
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82									
EQT0596	MR-6105A - MDI 2 DADPM Batch Operation																																						
EQT0597	MR-6105B - MDI 2 DADPM Batch Operation																																						
EQT0598	MR-6105C - MDI 2 DADPM Batch Operation																																						
EQT0599	MR-6105D - MDI 2 DADPM Batch Operation																																						
EQT0600	MR-6105E - MDI 2 DADPM Continuous Operation																																						
EQT0601	MR-6105F - MDI 2 DADPM Continuous Operation																																						
EQT0602	MR-6106 - Neutralizer																																						
EQT0603	MR-6106C - Neutralizer																																						
EQT0604	MR-6107 - Neutralizer																																						
EQT0605	MR-9201 - MDI 3 Phosgenation Reactor Operation																																						
EQT0606	MR-9202 - MDI 3 Phosgenation Reactor Operation																																						
EQT0607	MR-9203 - MDI 3 Phosgenation Reactor Operation																																						

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82																			
EQT0608	MR-9204 – MDI 3 Phosgeneation Reactor Operation													3																																			
EQT0609	MR-9401A – Phosgene Reactor Operation													1																														1					
EQT0610	MR-9401B – Phosgene Reactor Operation													1																													1						
EQT0611	MR-9401C – Phosgene Reactor Operation													1																												1							
EQT0612	AS-4101 – DADPM Stripper Distillation Column													3																																			
EQT0613	AS-4103 – Amine Brine Stripper													3																														1					
EQT0614	AS-4104 – Methanol Fractionator													3																														1					
EQT0615	AS-4800 – Pure 1 Splitting Distillation Column													3																														1					
EQT0616	AS-6701 – Pure 2 Splitting Distillation Column													3																														1					
EQT0617	AS-6205 – PI Stripper Column													3																														2					
EQT0618	AS-6202 – MDI Purification Distillation Column													3																														2					
EQT0619	AS-6203 – MDI Purification Distillation Column													3																														2					
EQT0620	AS-6201 – MDI 2 Recovery Distillation Column													3																														2					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
 RUBICON LLC
 GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	RRRR	64	65	68	82						
EQT0621	MS-6210 – MDI 2 Recovery Distillation Column																																				
EQT0622	AS-6301 – MDI 2 Phosgene Absorber Column																																				
EQT0623	AS-4201 – MDI 1 MCB Recovery Distillation Column																																				
EQT0624	MS-4210 – MDI 1 MCB Recovery Distillation Column																																				
EQT0625	AS-4301 – MDI Phosgene Absorber Column																																				
EQT0626	AS-4202 – MDI 1 Purification Distillation Column																																				
EQT0627	AS-4203 – MDI 1 Phosgene Absorber Column																																				
EQT0628	AS-6101 – DADPM 2 Distillation Column																																				
EQT0629	AS-6103 – Effluent Recovery Distillation Column																																				
EQT0630	AS-6104 – Effluent Recovery Distillation Column																																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82							
EQT0632	AS-9201 – MDI 3 MCB Recovery Distillation Column												3									2	2														
EQT0633	MS-9210 – MDI 3 MCB Recovery Distillation Column												3									2	2														
EQT0634	AS-9301 – MDI 3 Phosgene Absorber Column												3									2	2														
EQT0635	AS-9202 – MDI 3 MDI Purification Distillation Column												3									2	2														
EQT0636	AS-9203 – MDI 3 MDI Purification Distillation Column												3									2	2														
EQT0637	AS-9702 – Pure 3 Lights Removal Column												3									2	2														
EQT0638	AS-9701 – Heavies Removal Column												3									2	2														
EQT0639	AS-9204 – HCl Clean-up Column												3									2	2														
EQT0640	MS-4216 – MDI Cooler												3									3	3														
EQT0641	MDI HCl Loading												3									3	3														
EQT0642	MS-6216 – MDI Cooler												3									3	3														
EQT0652	GU-4104 – Effluent Extractor												3									3	3														
EQT0653	GU-6104 – Effluent Extractor												3									3	3														

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
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EQT0656	HCl Tank Truck/Railcar Loading																																																
EQT0657	TT-4211A – Economizer																																																
EQT0658	TT-4211B – Economizer																																																
EQT0659	GY-4110 – In-line Water Heater																																																
EQT0660	GY-6110 – In-line Water Heater																																																
EQT0661	TT-4829 – Tempered Water Cooler																																																
EQT0662	TT-4831 – Variants Reactor Water Cooler																																																
EQT0663	TT-4841 – Variants Reactor Water Cooler																																																
EQT0664	TT-4214A – Pump Out Unit Condenser																																																
EQT0665	TT-4214B – Pump Out Unit Condenser																																																
EQT0666	TT-6550 – Pump Out Unit Condenser																																																
EQT0667	TT-6551 – Refrigeration Condenser																																																
EQT0668	TT-6552 – Refrigeration Economizer																																																
EQT0669	TT-4859 – 1 st Surface Condenser																																																
EQT0670	TT-4860 – 2 nd Surface Condenser																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
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EQT0671	TT-4861 – 3 rd Surface Condenser																																																
EQT0672	TT-4863 – Variants Reactor F Cooler and Heater																																																
EQT0673	TT-4864 – Variants Reactor F Cooler and Heater																																																
EQT0674	TT-9705 – Tempered Water Cooler																																																
EQT0675	TT-9707 – Crystallizer HTM Heater																																																
EQT0676	TT-9320 – HCl Compressor Lube Oil Cooler																																																
EQT0677	TI-4832 – Water System Exchanger																																																
EQT0678	TT-4946 – 2 nd Blender Water Cooler																																																
EQT0679	TT-4404A – Phosgene Reactor Cooler																																																
EQT0680	TT-4404B – Phosgene Reactor Cooler																																																
EQT0681	TI-4404C – Phosgene Reactor Cooler																																																
EQT0682	TT-4404D – Phosgene Reactor Cooler																																																
EQT0683	TT-9404A – Phosgene Reactor Cooler																																																
EQT0684	TI-9404B – Phosgene Reactor Cooler																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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RUBICON LLC
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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63																
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82												
EQT0685	PC-9316D - Refrigeration System Condenser																																									
EQT0686	PC-9316F - Economizer																																									
EQT0687	PC-9316J - Oil Cooler																																									
EQT0688	PC-9316P - Oil Cooler																																									
EQT0689	TT-4302 - HCl Absorber Condenser																																									
EQT0690	TT-4302S - HCl Absorber Condenser																																									
EQT0691	TT-6302A - HCl Absorber Condenser																																									
EQT0692	TT-6302B - HCl Absorber Condenser																																									
EQT0693	TT-9302A - HCl Absorber Condenser																																									
EQT0694	TT-9302S - HCl Absorber Condenser																																									
EQT0695	TT-6309 - HCl Concentrator																																									
EQT0696	TT-9309 - HCl Concentrator																																									
EQT0697	TT-4303A - HCl Absorber Bottoms Cooler																																									
EQT0698	TT-4303B - HCl Absorber Bottoms Cooler																																									
EQT0699	TT-6303A - HCl Absorber Bottoms Cooler																																									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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EQT0700	TT-6303B - HCl Absorber Bottoms Cooler																																																
EQT0701	TT-9303A - HCl Absorber Bottoms Cooler																																																
EQT0702	TT-9303B - HCl Absorber Bottoms Cooler																																																
EQT0703	TT-9318 - HCl Clean-up Column Condenser																																																
EQT0719	TT-6709 - Tempered Water Cooler																																																
EQT0720	GY-6701 - Hot Water Heater																																																
EQT0721	TT-6708 - Hot Water Cooler																																																
EQT0722	GY-6702 - Tempered Water Heater																																																
EQT0723	TT-9311 - Fume Scrubber Circulation Cooler																																																
EQT0724	TT-9703 - Distillate Cooler																																																
EQT0725	TS-4112 - Seal Flush Tank Coil Plate																																																
EQT0726	GJ-6701 - Condenser for Ejectors																																																
EQT0727	GJ-6702 - Condenser for Ejectors																																																
EQT0728	GJ-6703 - Condenser for Ejectors																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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EQT0729	TT-6704 – Pure MDI Condenser																																									
EQT0730	GJ-6705 – Condenser for Ejectors																																									
EQT0731	GJ-6706 – Condenser for Ejectors																																									
EQT0732	GJ-6707 – Condenser for Ejectors																																									
EQT0733	GJ-6708 – Condenser for Ejectors																																									
EQT0734	GJ-6709 – Condenser for Ejectors																																									
EQT0735	GJ-6710 – Condenser for Ejectors																																									
EQT0736	TT-4106 – DADPM Stripper Condenser																																									
EQT0737	TT-6106 – DADPM Stripper Condenser																																									
EQT0738	TT-4121 – Aniline Water/Aniline Cooler																																									
EQT0739	TT-6121 – Aniline Water/Aniline Cooler																																									
EQT0740	TT-4122 – MeOH Condenser																																									
EQT0741	TT-6122 – MeOH Condenser																																									
EQT0742	TT-4125 – Vacuum Pump Liquid Cooler																																									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNNN	64	65	68	82																			
EQT0743	TT-6125 – Vacuum Pump Liquid Cooler																																																
EQT0745	TT-4127 – Neutralizer Vent Condenser																																																
EQT0746	TT-6104 – Neutralizer Vent Condenser																																																
EQT0747	TT-6104C – Neutralizer Vent Condenser																																																
EQT0748	TT-4260 – Recovery Column Offgas Condenser																																																
EQT0749	TT-6260 – Recovery Column Offgas Condenser																																																
EQT0750	TT-4102A – Reactor Vent Condenser																																																
EQT0751	TT-4102B – Reactor Vent Condenser																																																
EQT0752	TT-4802 – Distillate Cooler																																																
EQT0753	TT-4803 – Distillate Condenser																																																
EQT0754	TT-4804 – 1 st Guard Condenser																																																
EQT0755	TT-6703 – Mixed Isomer Condenser																																																
EQT0757	TT-6706 – Mixed Isomer Cooler																																																
EQT0758	TT-4805A – 2 nd Guard Condenser																																																
EQT0759	DiisoCrystallizer Bundle																																																

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

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ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63													
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82									
EQT0760	TT-4119 - DADPM Stripper Bottoms Cooler																																						
EQT0761	TT-6119 - DADPM Stripper Bottoms Cooler																																						
EQT0762	TT-4128 - MeOH Bottoms Cooler																																						
EQT0763	TT-6128 - MeOH Bottoms Cooler																																						
EQT0764	TT-6102A - DADPM Reactor Vent Condenser																																						
EQT0765	TT-6102B - DADPM Reactor Vent Condenser																																						
EQT0766	TT-6102C - DADPM Reactor Vent Condenser																																						
EQT0767	TT-6102D - DADPM Reactor Vent Condenser																																						
EQT0768	TT-6102E - DADPM Reactor Vent Condenser																																						
EQT0769	TT-6102F - DADPM Reactor Vent Condenser																																						
EQT0776	TT-4207 - MCB Cooler																																						
EQT0777	TT-6207 - MCB Cooler																																						
EQT0778	TT-9207 - MCB Cooler																																						
EQT0779	TT-9704 - MCB Cooler																																						
EQT0780	TT-9260 - Recovery Column Off Gas Condenser																																						
EQT0781	TT-9315A - HCl Compressor 1" Intercooler																																						

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MDI PLANT; AI No. 1468; PER20080019

RUBICON LLC

GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60												40 CFR 61												40 CFR											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82							
EQT0782	TT-9315B - HCl Compressor 2 nd Intercooler																																				
EQT0783	TT-9316 - HCl Compressor Aftercooler																																				
EQT0785	TT-4213 - Product Cooler																																				
EQT0786	TT-6276 - Product Cooler																																				
EQT0787	TT-9276 - Product Cooler																																				
EQT0788	TT-4509 - EDMI Reactor Cooler																																				
EQT0789	TT-4801A - Crash Cooler																																				
EQT0790	TT-4801S - Crash Cooler																																				
EQT0791	TT-4101A - DADPM Reactor Cooler																																				
EQT0792	TT-4101B - DADPM Reactor Cooler																																				
EQT0793	TT-6101A - DADPM Reactor Cooler																																				
EQT0794	TT-6101B - DADPM Reactor Cooler																																				
EQT0795	TT-6101C - DADPM Reactor Cooler																																				
EQT0796	TT-6101D - DADPM Reactor Cooler																																				
EQT0797	TT-6101E - DADPM Reactor Cooler																																				
EQT0798	TT-6101F - DADPM Reactor Cooler																																				

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RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82								
EQT0799	TT-4401 - Phosgene Reactor Condenser																																				
EQT0800	TT-9401 - Phosgene Reactor Condenser																																				
EQT0801	TT-6311 - Fume Scrubber Cooler																																				
EQT0803	TT-9722 - 3 rd Stage Condenser																																				
EQT0804	TT-9723 - 4 th Stage Condenser																																				
EQT0805	TT-9724 - 5 th Stage Condenser																																				
EQT0806	TT-4241 - Condensate Cooler																																				
EQT0807	TT-4247 - Solvent Wash Cooler																																				
EQT0808	TT-4250 - DADPM Cooler																																				
EQT0809	TT-4251 - Reactor Intercooler																																				
EQT0810	TT-4252 - IC2 Intercooler																																				
EQT0811	TT-4253 - Pilot Plant Vent Condenser																																				
EQT0813	GR-4221A - Suction Separator KO																																				
EQT0814	MM-4301 - HCl Absorber Cond. KO																																				
EQT0815	MM-4303 - HCl Absorber Cond. KO																																				

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63												40 CFR					
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82													
EQT0816	MM-6301 – HCl Absorber Cond. KO																																										
EQT0817	PC-9316G – Refrigeration System Suction KO																																										
EQT0818	MM-4304 – Caustic Scrubber Heater KO																																										
EQT0819	MM-6304 – Caustic Scrubber Heater KO																																										
EQT0820	MM-9304 – Caustic Scrubber Heater KO																																										
EQT0821	MS-4205 – Reactor Air Cond. Separator KO																																										
EQT0822	MS-6205 – Reactor Air Cond. Separator KO																																										
EQT0823	MS-9205 – Reactor Air Cond. Separator KO																																										
EQT0824	MS-4229 – Vacuum Pump Separator KO																																										
EQT0825	MS-6229 – Vacuum Pump Separator KO																																										
EQT0826	MS-9229 – Vacuum Pump Separator KO																																										
EQT0827	MS-6702 – MCB Flash KO																																										
EQT0828	MS-6150 – DADPM Reaction Vent KO																																										
EQT0829	MS-4309 – Phosgene Absorber KO																																										

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82							
EQT0830	MS-6309 - Phosgene Absorber KO																																				
EQT0831	MS-9309 - Phosgene Absorber KO																																				
EQT0832	MS-9315 - HCl Compressor Suction KO																																				
EQT0834	MM-4204 - Vacuum Pump Carbate Cooler																																				
EQT0835	MM-6204 - Vacuum Pump Separator KO																																				
EQT0836	MM-4108 - OH Cond. KO																																				
EQT0837	MM-6201 - Rec. Col. KO																																				
EQT0838	MM-6202 - Rec. Col. KO																																				
EQT0839	MM-K10 - Off Gas Cond.																																				
EQT0840	MM-K10A - Rec. Column KO Vessel																																				
EQT0841	MM-6305 - Rec. Column KO Vessel																																				
EQT0842	PE-315 - Rec. Column KO Vessel																																				
EQT0843	PE-9315 - Phosgene Analyzer KO																																				
EQT0844	MM-9201 - MCB Recovery Column KO																																				
EQT0845	MM-9202 - MCB Recovery Column KO																																				
EQT0846	MS-9228 - Concentrator Column Feed Flash Drum																																				

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GEISMAR, ASCENSION PARISH, LOUISIANA

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60										40 CFR 61										40 CFR 63												
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82				
EQT0847	MM-K5 – Dechlo. Cond. Separator KO																																	
EQT0848	MS-9243A – Dechlorinator Condenser Separator																																	
EQT0849	MS-9243B – Dechlorinator Condenser Separator																																	
EQT0850	MM-9301 – HCl Absorber KO																																	
EQT0851	MM-9303 – HCl Absorber KO																																	
EQT0852	MM-6303 – HCl Absorber Cond. KO																																	
EQT0853	MS-6228 – Conc. Feed Flash Drum																																	
EQT0854	MS-4243 – Conc. Feed Flash Drum																																	
EQT0855	MS-6243A – Conc. Feed Flash Drum																																	
EQT0856	MS-6243B – Conc. Feed Flash Drum																																	
EQT0857	MS-4228 – Conc. Col. Flash Feed KO																																	
EQT0858	MS-4150 – DADPM Reaction Vent KO																																	
EQT0859	MM-9204 – Vacuum Pump Separator Cond. KO																																	
EQT0860	MS-6551 – Vacuum Pump Separator Cond. KO																																	

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82							
EQT0861	MS-9551 - Vacuum Pump Separator Cond. KO																																				
EQT0864	MS-4156 Amine Water/Aniline Separator																																				
EQT0865	MS-6156 Amine Water/Aniline Separator																																				
EQT0896	AS-6117 A - DADPM Continuous Isomerization Column																																				
EQT0897	AS-6117 B - DADPM Continuous Isomerization Column																																				
EQT0898	AS-6112 - CDU HCl Absorber Column																																				
EQT0899	MM-6122 - Neutralizer Separator Weir Box																																				
EQT0900	MR-6111 - CDU Feed Drum																																				
EQT0901	MR-6124 - Neutralizer MS-6121 - Neutralizer Separator																																				
EQT0902	TT-6116A - CDU Cooler TT-6116B - CDU Cooler																																				
EQT0903	TT-6116C - CDU Cooler																																				
EQT0904	TT-6116D - CDU Cooler																																				
EQT0905	TT-9XXX - Secondary refrigeration Condenser																																				
EQT0906																																					
EQT0907																																					

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63																	
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFFF	NNNNN	64	65	68	82													
EQT0908	AS-4302 - MDI 1 HCl Absorber													3						1	1																						
EQT0909	AS-6302 - MDI 2 HCl Absorber													3						2	2																						
EQT0910	AS-9302 - MDI 3 HCl Absorber																																										
EQT0911	MS-4302A - HCl Day Tank	3																			3	3																					
EQT1193	HCl Scrubber AS-5401																																										
EQT1194	MF-571A - HCl Storage Tank	3																			3	3																					
EQT1195	MF-572A - HCl Storage Tank	3																			3	3																					
EQT1196	MF-573A - HCl Storage Tank	3																			3	3																					
EQT1197	Loading - HCl Tank Truck Loading																				3	3																					
EQT1198	MF-571B - HCl Storage Tank	3																			3	3																					
EQT1199	MF-572B - HCl Storage Tank	3																			3	3																					
EQT1200	MF-573B - HCl Storage Tank	3																			3	3																					
FUG020	KS - MDI Plant Fugitive Emissions													1							1	1																					
FUG021	ZU - Wastewater System Fugitives																					1	1																				
RLP032	KD - MDI Test Tanks Vent																				3	3																					

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63.											
		A	D	Da	Db	Dc	K	Ka	Kb	II	GG	VV	NNN	RRR	A	F	M	V	FFF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82							
RLP033	KF - MDI 1 Aniline Storage Vent Seal Port MMK 1A																																				
RLP034	KH - MDI 1 DADPM Tanks Vent																																				
RLP035	KQ - MDI Bulk Tank Common Vent 1																																				
RLP036	KV - MDI Bulk Tanks Common Vent 2																																				
RLP037	MB - MDI 2 Test Tanks Vent																																				
RLP038	MC - MDI Bulk Tanks Common Vent 3																																				
RLP039	MD - Pure 2 MDI Day Tanks Vent																																				
RLP040	MG - Variants Storage Common Vent 1																																				
RLP041	MH - Variants Storage Common Vent 2																																				
RLP042	MO - MDI Inventory Tanks Common Vent 1																																				
RLP043	MY - Variants Product Storage Common Vent 1																																				
RLP044	NB - Pure 2 Crystallizer Tank Vent																																				
RLP045	NC - Pure 2 Crystallizer Heat Transfer Tanks Vent																																				
RLP046	ND - Pure 2 Distillate Hold and Test Tanks Vent																																				

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60												40 CFR 61												40 CFR 63											
		A	D	Da	Db	Dc	K	Ka	Kb	III	GG	VV	NNN	RRR	A	F	M	V	FF	A	F	G	H	Q	FFFF	NNNN	64	65	68	82							
RLP047	ZF - MDI 3 Test Tanks Vent																																				
RLP048	ZH - MDI 3 Inventory Tanks Vent																																				
RLP049	ZR - Distillate & Product Storage Tanks Vent																																				
RLP050	ZS - Pure MDI/MI-20 Storage Tank Vent																																				
RLP051	KJ - Pure 1 Distillate Vent																																				
RLP052	ZL - DADPM 2 Storage Vessel and Separation Weir Vent																																				

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 - The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
 - 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
 - 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- ** MA (EQT400) and ZE (EQT44) normally vent to the TDI Boilers (Emission Source 1A), and vent to atmosphere 73 days per year.

Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF006	40 CFR 64 – Compliance Assurance Monitoring	DOES NOT APPLY – The facility is subject to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to Section 111 and 112 of the Clean Air Act (40 CFR 64.2(b)(1)(i)).
EQT0371, 0372, 0373, 0374, 0376, 0378, 0380, 0381, and 0487	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.A). DOES NOT APPLY – Individual vessel capacity is < 75 m ³ (19,800 gal) (40 CFR 63.110(b(a))).
EQT0375, 0401, 0402, 0408 through 0413, 0415, 0445 0446, 0455, 0461, 0462, and 0488	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.A). EXEMPT – Capacity is 75 m ³ – 151 m ³ (19,800 gal – 39,900 gal) and vapor pressure < 15.0 kPa (2.17 psia) (40 CFR 63.110(b)).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0376, 0510, 0512, 0538 through 0544, 0558 through 0563, 0640, and 0642	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – Capacity < 250 gal (LAC 33:III.2103.A). DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.110b(a)). DOES NOT APPLY – Capacity < 75 m ³ (19,800 gal) (40 CFR 63.183 Table 2).
EQT0377, 0470, 0864, and 0865	LAC 33:III.2109 – Oil/Water Separation	EXEMPT – VOC true vapor pressure is less than 0.5 psia. Recordkeeping required (LAC 33:III.2109.B.3)
EQT0378, 0380, 0381, 0384, 0385, 0386, 0407, 0427 through 0434, 0467, 0469, 0471, 0472, 0473, 0514 through 0518, 0521 through 0529, 0548 through 0551, 0554, 0555, 0564, 0565, 0567, 0568, 0652, and 0653	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge Control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.110b(a)). DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.183 Table 2).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0379	LAC 33:III.2103 – Storage of Volatile Organic Compounds	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B).
	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – MACT is not required.
EQT0382	LAC 33:III.2103 – Storage of Volatile Organic Compounds	DOES NOT APPLY – Vessels do not store a VOC (LAC 33:III.2103.A).
	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – MACT is not required.
EQT0383, 0450, and 0456	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). EXEMPT – Capacity > 151 m ³ (39,900 gal) and vapor pressure < 3.5 kPa (0.51 psia) (40 CFR 60.110b(b)).
	NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	EXEMPT – Capacity > 151 m ³ (39,900 gal) and vapor pressure < 5.2 kPa (0.75 psia) (40 CFR 63.183 Table 2).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0387	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.A). EXEMPT – Capacity is < 151 m ³ (39,900 gal) and vapor pressure < 15.0 kPa (2.17 psia) (40 CFR 63.110(b)).
EQT0388 through 0391, 0396, 0397, and 0398	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) LAC 33:III.2107 – Volatile Organic Compounds – Loading	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). EXEMPT – Capacity is < 151 m ³ (39,900 gal) and vapor pressure < 15.0 kPa (2.17 psia) (40 CFR 63.110(b)).
EQT0392, 0420, 0421, 0451, 0452, and 0463	NESHAP for Source Categories Subpart Q – Chromium Emissions from Industrial Process Cooling Towers [40 CFR 63.400(a)]	DOES NOT APPLY – No water treatment programs containing chromium compounds are at the facility.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0399, 0403, 0404, 0416 through 0419, 0424, 0425, 0426, 0447, 0448 and 0454	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). EXEMPT – Capacity > 151 m ³ (39,900 gal) and vapor pressure < 3.5 kPa (0.51 psia) (40 CFR 60.110b(b)).
EQT0400 and 0444	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – Vent is normally sent to a combustion device. Use of a combustion device during normal operation constitutes MACT.
	NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	DOES NOT APPLY – Do not meet the definition of HON process vent due to transfer for fuel value (40 CFR 63.107(h)(6)).
EQT0405, 0406, 0407, 0438, 0457, 0458, 0459, 0466, and 0468	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.110b(a)).
	NESHAP for Sources Categories Subparts F and G Storage Vessels Provisions (40 CFR 63.100 and 63.119)	DOES NOT APPLY – Individual vessel capacity < 38 m ³ (10,038 gal) (40 CFR 63 Appendix to Subpart G Table 5).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0414, 0423, 0439, 0440, 0441, 0453, and 0578	LAC 33:III.2115 – Waste Gas Disposal	EXEMPT – Meet an exemption in another section of LAC 33:III. Chapter 21 – Section 2147.A.2.b.(LAC 33:III.2115 Preamble).
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	EXEMPT – Operated in batch mode (LAC 33:III.2147.A.2.b).
	LAC 33:III.2149 – Limiting Volatile Organic Compound Emissions from Batch Processing	EXEMPT – Mass annual emission rate < 500 lb/yr. Exempt from all provisions except recordkeeping (LAC 33:III.2149.A.2.b).
EQT0422	40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700) NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113) Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – Batch operation (40 CFR 60.700(c)(1)). EXEMPT – Batch operation (40 CFR 63.100(j)(4)). EXEMPT – Emits Class III TAP only. MACT is not required.
	NESHAP for Source Categories Subpart Q – Chromium Emissions from Industrial Process Cooling Towers [40 CFR 63.400(a)]	DOES NOT APPLY - No water treatment programs containing chromium compounds are at the facility.

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ID No:	Requirement	Notes
EQT0433, 0434, and 0435	LAC 33:III.2103 – Storage of Volatile Organic Compounds Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). EXEMPT - Emits Class III TAP only. MACT is not required. EXEMPT – Capacity is 75 m ³ – 151 m ³ (19,800 gal – 39,900 gal) and vapor pressure < 15.0 kPa (2.17 psia) (40 CFR 63.110b(b)). EXEMPT – Capacity is 75 m ³ – 151 m ³ (19,800 gal – 39,900 gal) and vapor pressure < 13.1 kPa (1.9 psia) (40 CFR 63.183 Table 2).
EQT0437, 0530 through 0537	LAC 33:III.2103 – Storage of Volatile Organic Compounds 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.B). EXEMPT – Capacity is 75 m ³ – 151 m ³ (19,800 gal – 39,900 gal) and vapor pressure < 15.0 kPa (2.17 psia) (40 CFR 63.110b(b)). EXEMPT – Capacity is 75 m ³ – 151 m ³ (19,800 gal – 39,900 gal) and vapor pressure < 13.1 kPa (1.9 psia) (40 CFR 63.183 Table 2).

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ID No:	Requirement	Notes
EQT0442 and 0443	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – Emits Class III TAP only. MACT is not required.
	NESHAP for Source Categories Subpart Q – Chromium Emissions from Industrial Process Cooling Towers [40 CFR 63.400(a)]	DOES NOT APPLY – No water treatment programs containing chromium compounds are at the facility.
EQT0464, 0467, 0469, 0471, 0472, and 0473	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – Emits Class III-TAP only. MACT is not required.
EQT0474	NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113) LAC 33:III.2103 – Storage of Volatile Organic Compounds	EXEMPT – No process vents are routed to this source (40 CFR 63.111). DOES NOT APPLY – Vessels do not store a VOC (LAC 33:III.2103.A).
EQT0476 through 0486, 0497, and 0513	40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	DOES NOT APPLY – Vessels do not store a VOL (40 CFR 60.110b(a)).
	NESHAP for Sources Categories Subparts F and G Storage Vessel Provisions (40 CFR 63.100 and 63.119)	DOES NOT APPLY – Vessels do not store an organic HAP (Table 5, Appendix to 40 CFR 63 Subpart G).

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ID No:	Requirement	Notes
EQT0489, 0490, and 0492 through 0496	LAC 33:III.2103 – Storage of Volatile Organic Compounds - 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – Vessels do not store a VOC (LAC 33:III.2103.A). DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.110b(a)).
EQT0556, 0557, 0569, 0570, 0571, and 0573 through 0577	40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b) NESHAP for Sources Categories Subparts F and H Surge Control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.110b(a)). DOES NOT APPLY – Individual vessel capacity < 75 m ³ (19,800 gal) (40 CFR 63.183 Table 2).
EQT0579 through 0582, 0588, 0589, 0590, 0623 through 0627	LAC 33:III.2115 – Waste Gas Disposal LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	DOES NOT APPLY – Required by the HON to implement controls that reduce VOCs to a more stringent standard than required by LAC 33:III.2115 (LAC 33:III.2115 Preamble). DOES NOT APPLY – Subject to HON (LAC 33:III.2147.A.2.g).

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ID No:	Requirement	Notes
EQT0579 through 0582, 0588, 0589, 0590, 0623 through 0627 (Continued)	40 CFR 60 Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (40 CFR 60.660)	DOES NOT APPLY – No construction, reconstruction, or modification commenced after December 30, 1983 (40 CFR 60.660(b)).
EQT0583 through 0586	LAC 33:III.2115 – Waste Gas Disposal	DOES NOT APPLY – Meet an exemption in another section of LAC 33:III.Chapter 21 – Section 2147.A.2.a (LAC 33:III.2115 Preamble). EXEMPT – Vent to a combustion device (LAC 33:III.2147.A.2.a).
EQT0587 through 0590	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations 40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700) NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	DOES NOT APPLY – No construction, reconstruction, or modification commenced after June 29, 1990 (40 CFR 60.700(b)). EXEMPT – Do not meet the definition of HON process vent due to transfer for fuel value (40 CFR 63.107(h)(6)). DOES NOT APPLY – Meet an exemption in another section of LAC 33:III.Chapter 21 – Section 2147.A.2.a (LAC 33:III.2115 Preamble). EXEMPT – Vent to a combustion device (LAC 33:III.2147.A.2.a).

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ID No:	Requirement	Notes
EQT0587 through 0590 (Continued)	40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700)	DOES NOT APPLY – No construction, reconstruction, or modification commenced after June 29, 1990 (40 CFR 60.700(b)).
EQT0591, 0592, and 0593	LAC 33:III.2115 – Waste Gas Disposal	EXEMPT – Meet an exemption in another section of LAC 33:III. Chapter 21 – Section 2147.A.2.b (LAC 33:III.2115 Preamble).
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	EXEMPT – Operated in batch mode (LAC 33:III.2147.A.2.b).
	LAC 33:III.2149 – Limiting Volatile Organic Compound Emissions from Batch Processing	EXEMPT – Operate with an existing recovery device employed to control VOC emissions (LAC 33:III.2149.A.2.c).
	40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700)	EXEMPT – Batch operation (40 CFR 60.700(c)(1)).
	NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	EXEMPT – Batch operation (40 CFR 63.100(j)(4)).
EQT0594	LAC 33:III.2115 – Waste Gas Disposal	EXEMPT – Meet an exemption in another section of LAC 33:III. Chapter 21 – Section 2147.A.2.b (LAC 33:III.2115 Preamble).
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.d).

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ID No:	Requirement	Notes
EQT0594 (Continued)	40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700) NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	DOES NOT APPLY – Do not produce any of the chemicals listed in 40 CFR 60.707 as product, co-product, by-product, or intermediate (40 CFR 60.700(a)). EXEMPT – Provisions do not apply to research and development facilities (40 CFR 63.100(j)(1)).
EQT0596 through 0604	LAC 33:III.2115 – Waste Gas Disposal LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations LAC 33:III.2149 – Limiting Volatile Organic Compound Emissions from Batch Processing	DOES NOT APPLY – Meet an exemption in another section of LAC 33:III.Chapter 21 – Section 2147.A.2.b (LAC 33:III.2115 Preamble). EXEMPT – Operated in batch mode (LAC 33:III.2147.A.2.b). EXEMPT – Mass annual emission rate < 26,014 lb/yr. Exempt from all provisions, except recordkeeping (LAC 33:III.2149.A.2.a).
	40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700) NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	EXEMPT – Batch operation (40 CFR 60.700(c)(1)). EXEMPT – Batch operation (40 CFR 63.100(j)(4)).

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ID No.	Requirement	Notes
EQT0605 through 0608	LAC 33:III.2115 – Waste Gas Disposal LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations 40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700)	DOES NOT APPLY – Meet an exemption in another section of LAC 33:III. Chapter 21 – Section 2147.A.2.a (LAC 33:III.2115 Preamble). EXEMPT – Vent to a combustion device (LAC 33:III.2147.A.2.a).
EQT0609, 0610, and 0611	NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113) LAC 33:III.2115 – Waste Gas Disposal LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	DOES NOT APPLY – Do not produce any of the chemicals listed in 40 CFR 60.707 as product, co-product, by-product, or intermediate (40 CFR 60.700(a)). EXEMPT – Do not meet the definition of HON process vent due to transfer for fuel value (40 CFR 63.107(h)(6)). DOES NOT APPLY – Meet an exemption in another section of LAC 33:III. Chapter 21 – Section 2147.A.2.a (LAC 33:III.2115 Preamble). EXEMPT – Vent to a combustion device (LAC 33:III.2147.A.2.a). EXEMPT – Do not meet the definition of HON process vent due to transfer for fuel value (40 CFR 63.107(h)(6)).

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ID No:	Requirement	Notes
EQT0612	LAC 33:III.2115 – Waste Gas Disposal	EXEMPT – Meet an exemption in another section of LAC 33:III.Chapter 21 – Section 2147.A.2.g (LAC 33:III.2115 Preamble).
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g).
	40 CFR 60 Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (40 CFR 60.660)	DOES NOT APPLY – No construction, reconstruction, or modification commenced after December 30, 1983 (40 CFR 60.660(b)).
EQT0613, 0614, and 0615	LAC 33:III.2115 – Waste Gas Disposal	DOES NOT APPLY – Meet an exemption in another section of LAC 33:III.Chapter 21 – Section 2147.A.2.g (LAC 33:III.2115 Preamble).
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g).
	40 CFR 60 Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (40 CFR 60.660)	DOES NOT APPLY – Do not produce any of the chemicals listed in 60.667 as a product, co-product, by-product or intermediate (40 CFR 60.660(a)).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0616 through 0622, and 0632 through 0637	<p>LAC 33:III.2115 – Waste Gas Disposal</p> <p>LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations</p> <p>40 CFR 60 Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (40 CFR 60.660)</p> <p>NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)</p>	<p>DOES NOT APPLY – Meet an exemption in another section of LAC 33:III.Chapter 21 – Section 2147.A.2.a (LAC 33:III.2115 Preamble).</p> <p>EXEMPT – Vent to a combustion device (LAC 33:III.2147.A.2.a).</p> <p>DOES NOT APPLY – Do not produce any of the chemicals listed in 60.667 as a product, co-product, by-product or intermediate (40 CFR 60.660(a)).</p> <p>EXEMPT – Do not meet the definition of HON process vent due to transfer for fuel value (40 CFR 63.107(h)(6)).</p>
EQT0628 through 0630	<p>LAC 33:III.2115 – Waste Gas Disposal</p> <p>LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations</p> <p>40 CFR 60 Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (40 CFR 60.660)</p>	<p>DOES NOT APPLY – Required by the HON to implement controls that reduce VOCs to a more stringent standard than required by LAC 33:III.2115 (LAC 33:III.2115 Preamble)</p> <p>EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g).</p> <p>DOES NOT APPLY – Do not produce any of the chemicals listed in 60.667 as a product, co-product, by-product or intermediate (40 CFR 60.660(a)).</p>

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ID No:	Requirement	Notes
EQT0638 and 0639	LAC 33:III.2115 – Waste Gas Disposal	DOES NOT APPLY – Not discharged to the atmosphere (LAC 33:III.2115 Preamble).
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	DOES NOT APPLY – Not discharged to the atmosphere (LAC 33:III.2147.A.1).
	40 CFR 60 Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (40 CFR 60.660)	DOES NOT APPLY – Do not produce any of the chemicals listed in 60.667 as a product, co-product, by-product or intermediate (40 CFR 60.660(a)).
	NESHAP for Sources Categories Subparts F and G Process Vent Provisions (40 CFR 63.100 and 63.113)	EXEMPT – Vent streams are not a process vent (do not contain an organic HAP and do not vent to the atmosphere (40 CFR 63.101).
EQT0656	LAC 33:III.2107 – Volatile Organic Compounds – Loading 40 CFR 63.100 and 40 CFR 63.126 – NESHAP or Source Categories Subparts F and G Transfer Operations	EXEMPT – Does not load a VOC (LAC 33:III.2107.A) EXEMPT – Does not load an organic HAP (40 CFR 63.101).
EQT0657 through 0725, 0785 through 0790, 0801, and 0907	NESHAP for Source Categories Subpart F Heat Exchanger System Requirements (40 CFR 63.104)	DOES NOT APPLY – Do not contain > 5% of an organic HAP (40 CFR 63.104 Subpart F – Table 4) subject to cooling tower monitoring regulations (40 CFR 63.104(a)(6)).

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ID No:	Requirement	Notes
EQT0726 through 0743	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – Cooling water pressure is 35 kPa (5.08 psia) above maximum process side operating pressure. No MACT is required as per 40 CFR 63.104(a)(1). (LAC 33:III.5109.A)
	NESHAP for Source Categories Subpart F – Heat Exchanger System Requirements (40 CFR 63.104)	DOES NOT APPLY – Cooling water pressure is 35 kPa (5.08 psia) above maximum process side operating pressure (40 CFR 63.104(a)(1)).
EQT0755, 0757, 0758, 0759, 0803, 0804, and 0805	NESHAP for Source Categories Subpart F Heat Exchanger System Requirements (40 CFR 63.104)	DOES NOT APPLY – Cooling water pressure is 35 kPa (5.08 psia) above maximum process side operating pressure (40 CFR 63.104(a)(1)).
EQT0813 through 0817	LAC 33:III.2103 – Storage of Volatile Organic Compounds	DOES NOT APPLY – Vessels do not store a VOC (LAC 33:III.2103.A).
EQT0827 through 0832	LAC 33:III.2103 – Storage of Volatile Organic Compounds	DOES NOT APPLY – VOC vapor pressure < 1.5 psia at storage conditions (LAC 33:III.2103.A).
EQT0834 through 0859	LAC 33:III.2103 – Storage of Volatile Organic Compounds	DOES NOT APPLY – Capacity < 250 gal (LAC 33:III.2103.A).
EQT0896 through 0898, 0900, and 0901	LAC 33:III.2115 – Waste Gas Disposal	DOES NOT APPLY – Required by the HON to implement controls that reduce VOCs to a more stringent standard than required by LAC 33:III.2115 (LAC 33:II.2115 Preamble)
	LAC 33:III.2147 – Limiting VOC Emissions from SOCMI Reactor and Distillation Operations	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g).

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ID No.	Requirement	Notes
EQT0896 through 0898, 0900, and 0901 (Continued)	40 CFR 60 Subpart RRR – Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (40 CFR 60.700)	DOES NOT APPLY – Do not produce any of the chemicals listed in 60.667 as a product, co-product, by-product or intermediate (40 CFR 60.660(a)).
EQT0899	LAC 33:III.2103 – Storage of Volatile Organic Compounds	DOES NOT APPLY – Capacity is less than 250 gallons.
	40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60.110b)	EXEMPT – Capacity is less than 75 m ³ .
	NESHAP for Sources Categories Subparts F and H Surge control Vessels and Bottoms Receivers (40 CFR 63.100 and 63.170)	DOES NOT APPLY – Capacity is less than 75 m ³ .
EQT0906	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	DOES NOT APPLY – Cooling water pressure is 35 kPa (5.08 psia) above maximum process side operating pressure. No MACT is required per 40 CFR 63.104(a)(1) (LAC 33:III.5109.A)
	NESHAP for Source Categories Subpart F – Heat Exchanger System Requirements (40 CFR 63.104)	DOES NOT APPLY – Cooling water pressure is 35 kPa (5.08 psia) above maximum process side operating pressure (40 CFR 63.104(a)(1)).

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ID No:	Requirement	Notes
EQT1193	Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT - Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Emits class III compound (hydrochloric acid), MACT is not required. Recordkeeping is required.
EQT1194	Storage of Volatile Organic Compounds [LAC 33:III.2103.B] Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT - Vessels do not store a VOC. Tanks vented to Emission Point IQ (EQT234). EXEMPT - Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Emits class III compound (hydrogen chloride). MACT is not required.
	NSPS Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.60110b]	EXEMPT - Vessels do not store a VOL
EQT1194	NESHAP for Source Categories Subparts F & G storage Vessel Provisions [40 CFR 63.100 and 63.170]	EXEMPT - Tanks do not store an organic HAP.

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ID No:	Requirement	Notes
EQT1195 and 1196	Storage of Volatile Organic Compounds [LAC 33:III.2103.B] Emission Control and Reduction Requirements and Standards LAC 33:III.5109.A	EXEMPT – Vessels do not store a VOC. Tanks vented to Emission Point IQ (EQT234). EXEMPT – Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Emits class III compound (hydrogen chloride). MACT is not required.
	NSPS Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.60.110b]	EXEMPT – Vessels do not store a VOL
EQT1198 through 1200	NESHAP for Source Categories Subparts F & G storage Vessel Provisions [40 CFR 63.100 and 63.170]	EXEMPT – Tanks do not store an organic HAP.
	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	EXEMPT – Vessels do not store a VOC. Tanks vented to Emission Point IQ (EQT234).
	NSPS Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.60.110b]	EXEMPT – Vessels do not store a VOL

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1198 through 1200 (Continued).	NESHAP for Source Categories Subparts F & G storage Vessel Provisions [40 CFR 63.100 and 63.170]	EXEMPT - Tanks do not store an organic HAP.
FUG021	LAC 33:III.2153 – Limiting Volatile Organic Compound Emissions from Industrial Wastewater NESHAP for Sources Categories Subparts F and G – Control Requirements for Liquid Streams in Open Systems Within a Chemical Manufacturing Process Unit (40 CFR 63.149)	EXEMPT – Subject to HON maintenance wastewater provisions (LAC 33:III.2153.G.6). EXEMPT – Wastewater stream in open systems is an existing source that does not contain > 1000 parts per million of Table 9 compounds (40 CFR 63.149(e)(1)).

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- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

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- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long

40 CFR PART 70 GENERAL CONDITIONS

as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]

- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:

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1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I:Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December

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4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or

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system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application dated June 12, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

- date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33.III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:

1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

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- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Form_7030_r15
07/02/08

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1468 Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-V09
Air - Title V Regular Permit Renewal

D	Name	User Group	Start Date
A0000892	Rubicon LLC - Geismar Plant	CDS Number	05-27-1993
A0000892	Rubicon LLC - Geismar Plant	Hazardous Waste Notification	07-22-1980
AR05N485	Rubicon LLC - Geismar Plant	Hazardous Waste Permitting	10-01-1997
NWP1493	Rubicon LLC	Inactive & Abandoned Sites	07-01-1981
A-2282-L01	Rubicon LLC	LPDES Permit #	06-25-2003
GD-005-1646	Rubicon LLC	LPDES Permit #	08-08-2004
38794	Rubicon LLC	LWDPS Permit #	06-25-2003
480042	Rubicon LLC	Multimedia	12-24-2003
0707734RBCNN956H	Rubicon LLC	Priority 1 Emergency Site	07-18-2006
11482	Rubicon LLC	Radiation License Number	11-23-1999
11483	Rubicon LLC	Solid Waste Facility No.	11-21-1999
0303011102	Rubicon LLC	TEMPO Merge	10-30-2000
9156 Hwy 75	Rubicon LLC	TEMPO Merge	01-30-2001
Geismar, LA 70734	Rubicon LLC	Toxic Release Inventory	07-19-2004
PO Box 517	Rubicon LLC	UST Case Number	11-21-1999
Geismar, LA 707340517	Rubicon LLC	UST Case Number	11-21-1999
9156 Hwy 75	Rubicon LLC	UST FID #	10-11-2002
PO Box 517		Main FAX:	2256732470
Geismar, LA 70734		Main Phone:	2252425000
Name	Mailing Address	Phone (Type)	Relationship
Michelle Eaglin	PO Box 517 Geismar, LA 707340517	2252425590 (WP)	Underground Storage Tank Contact for
Tom Harbour	9156 Hwy 75 Geismar, LA 70734	2252425324 (WP)	Radiation Safety Officer for
Tom Harbour	9156 Hwy 75 Geismar, LA 70734	2252425272 (WF)	Radiation Safety Officer for
Tom Harbour	9156 Hwy 75 Geismar, LA 70734	Tom_J_Harbour@H	Radiation Safety Officer for
Tom Harbour	9156 Hwy 75 Geismar, LA 70734	2259783921 (CP)	Radiation Safety Officer for
Phil Kerr	PO Box 517 Geismar, LA 707340517	2252425027 (WP)	Air Permit Contact For
Phil Kerr	PO Box 517 Geismar, LA 707340517	PHILLIP_A_KERR@	Air Permit Contact For
Phil Kerr	PO Box 517 Geismar, LA 707340517	PHILLIP_A_KERR@	Emission Inventory Contact for
Phil Kerr	PO Box 517 Geismar, LA 707340517	2252425027 (WP)	Emission Inventory Contact for
Hannah Krawiecki	9156 Hwy 75 Geismar, LA 70734	2252425390 (WP)	Haz. Waste Billing Party for

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General Information

AI ID: 1468 Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Anthony Nelson	PO Box 517 Geismar, LA 707340517	2256736141 (WP)	Water Permit Contact For
	C. Eric Phillips	PO Box 517 Geismar, LA 707340517		Responsible Official for
	Henry Pine			Responsible Official for
	Clyde Stevens			Responsible Official for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	UST Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Owns
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Solid Waste Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Haz. Waste Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Water Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Air Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Radiation License Billing Party for
	Rubicon LLC	PO Box 517 Geismar, LA 707340517	2252425000 (WP)	Emission Inventory Billing Party
	Rubicon LLC	Attn Accounts Payable Geismar, LA 70734		Accident Prevention Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit.
 Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-0775 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER200800-19
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0369	KB - MDI 1 Fume Scrubber AS-4303A/B		190 gallons/min	50 gallons/min		8750 hr/yr (All Year)
EQT0370	KC - MDI 1 Caustic Scrubber AS-4304B		400 gallons/min	150 gallons/min		8750 hr/yr (All Year)
EQT0371	MS-4217A - Storage Vessel MS-4217A	13536 gallons				8750 hr/yr (All Year)
EQT0372	MS-4217B - Storage Vessel MS-4217B	13536 gallons				8750 hr/yr (All Year)
EQT0373	MS-4217C - Storage Vessel MS-4217C	13536 gallons				8750 hr/yr (All Year)
EQT0374	MS-4906 - Storage Vessel MS-4906	19274 gallons				8750 hr/yr (All Year)
EQT0375	MF-4118 - Storage Vessel MS-4118	22584 gallons				8750 hr/yr (All Year)
EQT0376	MF-4110 - Aniline/Water Separator Vessel Box M-14110	215 gallons				8750 hr/yr (All Year)
EQT0377	MS-4115 - Aniline/Water Separator MS-4115	1880 gallons				8750 hr/yr (All Year)
EQT0378	MS-4118 - Wash Water Feed MS-4118	515 gallons				8750 hr/yr (All Year)
EQT0379	MS-4121 - Wei Aniline Storage MS-4121	11752 gallons				8750 hr/yr (All Year)
EQT0380	MS-4122 - DADPM Stripper Overhead Seal Pot Tank MS-4122	213 gallons				8750 hr/yr (All Year)
EQT0381	MS-4158 - Amine Water Pump Out Pot MS-4158	522 gallons				8750 hr/yr (All Year)
EQT0382	KG - MDI Ammonia Solution Tank MF-4512	21151 gallons				8750 hr/yr (All Year)
EQT0383	MF-4223 - Storage Vessel MS-4223	74592 gallons				8750 hr/yr (All Year)
EQT0384	MF-4112A - Storage Vessel MS-4112A	9400 gallons				8750 hr/yr (All Year)
EQT0385	MF-4112B - Storage Vessel MS-4112B	9400 gallons				8750 hr/yr (All Year)
EQT0386	MF-4112C - Storage Vessel MS-4112C	15000 gallons				8750 hr/yr (All Year)
EQT0387	MF-4112D - Storage Vessel MS-4112D	23050 gallons				8750 hr/yr (All Year)
EQT0388	KJ - KJ - Pure 1 Bulk Tank MS-4910	20152 gallons				8750 hr/yr (All Year)
EQT0389	KK - Pure 1 Mother Liquor Bulk Tank MS-4913	23031 gallons				8750 hr/yr (All Year)
EQT0390	MS-4503A - Storage Vessel MS-4503A	40649 gallons				8750 hr/yr (All Year)
EQT0391	MS-4503B - Storage Vessel MS-4503B	42301 gallons				8750 hr/yr (All Year)
EQT0392	KT - DADPM Rail Cart/Truck Loading		10.2 MM lbs/yr	10.2 MM lbs/yr		8750 hr/yr (All Year)
EQT0393	GT-4501 - Cooling Tower GT-4501					8750 hr/yr (All Year)
EQT0394	GT-4528 - Cooling Tower GT-4528					8750 hr/yr (All Year)
EQT0395	GT-4938 - Cooling Tower GT-4938					8750 hr/yr (All Year)
EQT0396	MF-4503C - Storage Vessel MS-4503C	42301 gallons				8750 hr/yr (All Year)
EQT0397	MF-4503D - Storage Vessel MS-4503D	77585 gallons				8750 hr/yr (All Year)
EQT0398	MF-4503E - Storage Vessel MS-4503E	77585 gallons				8750 hr/yr (All Year)
EQT0399	KZ - MI-50 Storage Tank MS-4988	41110 gallons				8750 hr/yr (All Year)
EQT0400	MA - MDI 2 Caustic Scrubber AS-6304B		400 gallons/min	400 gallons/min	Vents to the atmosphere 73 days per year	1752 hr/yr (All Year)
EQT0401	MF-6217A - Storage Vessel MF-6217A	23031 gallons				8750 hr/yr (All Year)
EQT0402	MF-6217B - Storage Vessel MF-6217B	23031 gallons				8750 hr/yr (All Year)
EQT0403	MF-4503H - Storage Vessel MF-4503H	102793 gallons				8750 hr/yr (All Year)
EQT0404	MF-4503I - Storage Vessel	102793 gallons				8750 hr/yr (All Year)
EQT0405	MF-6701A - Storage Vessel MF-6701A	8484 gallons				8750 hr/yr (All Year)
EQT0406	MF-6701B - Storage Vessel MF-6701B	8484 gallons				8750 hr/yr (All Year)
EQT0407	MF-6703A - Pure II Mixed Isomer Day Storage MF-6703A	5171 gallons				8750 hr/yr (All Year)
EQT0408	MS-4917 - Storage Vessel MS-4917	23607 gallons				8750 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-V09
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0409	MS-4918 - Storage Vessel MS-4918	23607 gallons				8760 hr/yr (All Year)
EQT0410	MS-4919 - Storage Vessel MS-4919	23607 gallons				8760 hr/yr (All Year)
EQT0411	MF-4517 - Storage Vessel MF-4517	25469 gallons				8760 hr/yr (All Year)
EQT0412	MF-4518 - Storage Vessel MF-4518	25469 gallons				8760 hr/yr (All Year)
EQT0413	MH-1 - Storage Vessel MF-4519	25598 gallons		5 MM gallons/yr		8760 hr/yr (All Year)
EQT0414	MH-2 - EMDI Reactor MR-4513			16 MM gallons/yr		8760 hr/yr (All Year)
EQT0415	MK - Varians Storage Tank MF-4945	23607 gallons		5 MM gallons/yr		8760 hr/yr (All Year)
EQT0416	MM - MDI Bulk Tank MF-4503F	102793 gallons		22.8 MM gallons/yr		8760 hr/yr (All Year)
EQT0417	MN - MDI Bulk Tank MF-4503G	102793 gallons		8 MM gallons/yr		8760 hr/yr (All Year)
EQT0418	MF-8245A - Storage Vessel MF-8245A	508370 gallons				8760 hr/yr (All Year)
EQT0419	MF-8245B - Storage Vessel MF-8245B	508370 gallons				8760 hr/yr (All Year)
EQT0420	MQ - MDI Truck Loading/Unloading		570.9 MM lbs/yr			8760 hr/yr (All Year)
EQT0421	MR - MDI Railcar Loading/Unloading		466.7 MM lbs/yr			8760 hr/yr (All Year)
EQT0422	MU - MDI 2 Cooling Tower GT-6501		25000 gallons/min	25000 gallons/min		8760 hr/yr (All Year)
EQT0423	MW - Varians Reactor "D" MR-4841	9988 gallons		10.6 MM gallons/yr		8760 hr/yr (All Year)
EQT0424	MX - Varians Product Storage Tank MF-4503J	102793 gallons		8 MM gallons/yr		8760 hr/yr (All Year)
EQT0425	MF-4503K - Storage Vessel MF-4503K	80349 gallons				8760 hr/yr (All Year)
EQT0426	MF-4503L - Storage Vessel MF-4503L	80349 gallons				8760 hr/yr (All Year)
EQT0427	MS-6801 - Storage Vessel MS-6801	3753 gallons				8760 hr/yr (All Year)
EQT0428	MS-6802 - Storage Vessel MS-6802	1441 gallons				8760 hr/yr (All Year)
EQT0429	MS-6803 - Storage Vessel MS-6803	3122 gallons				8760 hr/yr (All Year)
EQT0430	MS-6804 - Storage Vessel MS-6804	1871 gallons				8760 hr/yr (All Year)
EQT0431	MS-6805 - Storage Vessel MS-6805	6195 gallons				8760 hr/yr (All Year)
EQT0433	MS-6806 - Storage Vessel MS-6806	7155 gallons				8760 hr/yr (All Year)
EQT0434	MS-6807 - Storage Vessel MS-6807	11150 gallons				8760 hr/yr (All Year)
EQT0435	MS-6808 - Storage Vessel MS-6808	141 gallons				8760 hr/yr (All Year)
EQT0436	MC-6810 - Process Equipment MC-6810	15122 gallons				8760 hr/yr (All Year)
EQT0437	MS-6709 - Storage Vessel MS-6709	20728 gallons				8760 hr/yr (All Year)
EQT0438	MS-6710 - Storage Vessel MS-6710	8484 gallons				8760 hr/yr (All Year)
EQT0439	NN - Variants "C" Reactor MR-4901	5264 gallons		5.3 MM gallons/yr		8760 hr/yr (All Year)
EQT0440	NO - Variants "A" Reactor MR-4840	5264 gallons		7.6 MM gallons/yr		8760 hr/yr (All Year)
EQT0441	NP - Variants "B" Reactor MR-4840	5264 gallons		5.3 MM gallons/yr		8760 hr/yr (All Year)
EQT0442	OE - Nitric Acid Cooling Tower GT-1454		10800 gallons/min	10800 gallons/min		8760 hr/yr (All Year)
EQT0443	ZB - MDI 3 Cooling Tower GT-8310	100000 gallons/min	400 gallons/min	100000 gallons/min	Vents to the atmosphere 73 days per year	1752 hr/yr (All Year)
EQT0444	ZE - MDI 3 Caustic Scrubber AS-9304B		400 gallons/min	400 gallons/min		1752 hr/yr (All Year)
EQT0445	MF-9217A - Storage Vessel MF-9217A	23031 gallons				8760 hr/yr (All Year)
EQT0446	MF-9217B - Storage Vessel MF-9217B	23031 gallons				8760 hr/yr (All Year)
EQT0447	MF-8245C - Storage Vessel MF-8245C	300811 gallons				8760 hr/yr (All Year)
EQT0448	MF-8245D - Storage Vessel MF-8245D	300811 gallons				8760 hr/yr (All Year)
EQT0449	ZI - MDI 2 Fume Scrubber AS-6303		190 gallons/min	50 gallons/min		1752 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
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 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0450	ZK - MDI 2 DADPM Tank MF-6101	159866 gallons		15.27 MM gallons/yr		8760 hr/yr (All Year)
EQT0451	ZW - MDI 3 Truck Loading/Unloading		613.94 MM lbs/yr	613.94 MM lbs/yr		8760 hr/yr (All Year)
EQT0452	ZN - MDI 3 Railcar Loading/Unloading		613.94 MM lbs/yr	613.94 MM lbs/yr		8760 hr/yr (All Year)
EQT0453	ZO - Variants Reactor F - MR-4842	9988 gallons		10.6 MM gallons/yr		8760 hr/yr (All Year)
EQT0454	ZP - Variants Product Storage Tank MF-4503M	55203 gallons		15.14 MM gallons/yr		8760 hr/yr (All Year)
EQT0455	ZQ - Pure 2 MF-30 Storage Tank MS-6716	20728 gallons		11.94 MM gallons/yr		8760 hr/yr (All Year)
EQT0456	MS-9703 - Storage Vessel MS-9703	40750 gallons				8760 hr/yr (All Year)
EQT0457	MS-9708 - Storage Vessel MS-9708	9263 gallons				8760 hr/yr (All Year)
EQT0458	MS-9709 - Storage Vessel MS-9709	7449 gallons				8760 hr/yr (All Year)
EQT0459	MS-9710 - Storage Vessel MS-9710	6931 gallons				8760 hr/yr (All Year)
EQT0460	MC-9700 - Process Equipment MC-9700	10580 gallons				8760 hr/yr (All Year)
EQT0461	MS-9711 - Storage Vessel MS-9711	25334 gallons				8760 hr/yr (All Year)
EQT0462	MS-9712 - Storage Vessel MS-9712	25334 gallons				8760 hr/yr (All Year)
EQT0463	ZT - Pure 3 Truck Loading/Unloading		70.4 MM lbs/yr	70.4 MM lbs/yr		8760 hr/yr (All Year)
EQT0464	ZW : Variants CCP Product Storage Tank MF-4503N	55706 gallons		4.1 MM gallons/yr		8760 hr/yr (All Year)
EQT0465	MC-4800 - Process Equipment MC-4800	9873 gallons				8760 hr/yr (All Year)
EQT0466	MS-4802A - Storage Vessel MS-4802A	3635.gallons				8760 hr/yr (All Year)
EQT0467	MS-4802B - Surge Control Vessel MS-4802B	12908 gallons				8760 hr/yr (All Year)
EQT0468	MS-4802C - Storage Vessel MS-4802C	7423 gallons				8760 hr/yr (All Year)
EQT0469	MM-6110 - Storage Vessel MM-6110	215 gallons				8760 hr/yr (All Year)
EQT0470	MS-6115 - Aniline/Water Separator MS-6115	1880 gallons				8760 hr/yr (All Year)
EQT0471	MS-6118 - Storage Vessel MS-6118	515 gallons				8760 hr/yr (All Year)
EQT0472	MS-6122 - Storage Vessel MS-6122	213 gallons				8760 hr/yr (All Year)
EQT0473	MS-6158 - Storage Vessel MS-6158	522 gallons				8760 hr/yr (All Year)
EQT0474	ZA - MDI 3 Fume Scrubber AS-9303		191 gallons/min	50 gallons/min		8760 hr/yr (All Year)
EQT0475	ZV - Startup and Shutdown Emissions				(None Specified)	
EQT0476	MF-6302A - HCl Storage Tank - MF-6302A					8760 hr/yr (All Year)
EQT0477	MF-6302B - HCl Storage Tank - MF-6302B					8760 hr/yr (All Year)
EQT0478	MF-6302C - HCl Storage Tank - MF-6302C					8760 hr/yr (All Year)
EQT0479	MS-4302B - HCl Storage Tank - MS-4302B					8760 hr/yr (All Year)
EQT0480	MS-4302C - HCl Storage Tank - MS-4302C					8760 hr/yr (All Year)
EQT0481	MS-4302D - HCl Storage Tank - MS-4302D					8760 hr/yr (All Year)
EQT0482	MS-4302E - HCl Storage Tank - MS-4302E					8760 hr/yr (All Year)
EQT0483	MF-4302F - HCl Storage Tank - MF-4302F					8760 hr/yr (All Year)
EQT0484	MF-4302G - HCl Storage Tank - MF-4302G					8760 hr/yr (All Year)
EQT0485	MF-9302A - HCl Storage Tank - MF-9302A					8760 hr/yr (All Year)
EQT0486	MF-9302B - HCl Storage Tank - MF-9302B					8760 hr/yr (All Year)
EQT0487	MS-4101A - Formalin Day Tank - MS-4101A					8760 hr/yr (All Year)
EQT0488	MS-4101B - Formalin Day Tank - MS-4101B					8760 hr/yr (All Year)
EQT0489	MS-4210A - Receiver - MS-4210A				Recycled back to process	8760 hr/yr (All Year)

INVENTORIES

All ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-Y09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0490	MS-4210B - Receiver - MS-4210B				Recycled back to process	8760 hr/yr (All Year)
EQT0491	MM-6551 - Refrigeration Compressor Drain - MM 6551				Recycled back to process	8760 hr/yr (All Year)
EQT0492	MM-9551 - Refrigeration Compressor Drain - MM 9551				Recycled back to process	8760 hr/yr (All Year)
EQT0493	MS-4240 - Compressor Drain - MS-4240				Recycled back to process	8760 hr/yr (All Year)
EQT0494	MS-6552 - Refrigeration Receiver - MS-6552				Recycled back to process	8760 hr/yr (All Year)
EQT0495	MS-9552 - Refrigeration Receiver - MS-9552				Recycled back to process	8760 hr/yr (All Year)
EQT0496	PC-9316E - Refrigeration Receiver - PC-9316E				Recycled back to process	8760 hr/yr (All Year)
EQT0497	MF-4302A - HCl Day Storage - MF-4302A					8760 hr/yr (All Year)
EQT0510	MM-4406 - Chlorine Expansion Vessel - MM-4406					8760 hr/yr (All Year)
EQT0512	MM-9406 - Chlorine Expansion Vessel - MM-9406					8760 hr/yr (All Year)
EQT0513	MS-4304 - HCl Run Down - MS-4304					8760 hr/yr (All Year)
EQT0514	GU4103 - Graesser - GU4103					8760 hr/yr (All Year)
EQT0515	GU-6103 - Graesser - GU-6103					8760 hr/yr (All Year)
EQT0516	MF-4108 - Unwashed DADPM Hold - MF-4108					8760 hr/yr (All Year)
EQT0517	MF-6108 - Unwashed DADPM Hold - MF-6108					8760 hr/yr (All Year)
EQT0518	MS-4212 - Concentrated Crude Storage - MS-4212					8760 hr/yr (All Year)
EQT0521	MS-6701 - Precursor Feed Pot - MS-6701					8760 hr/yr (All Year)
EQT0522	MS-9701 - Precursor Feed Pot - MS-9701					8760 hr/yr (All Year)
EQT0523	MS-4800 - Demister - MS-4800					8760 hr/yr (All Year)
EQT0524	LUWA Bottoms Level - MS-4801				Recycled back to process	8760 hr/yr (All Year)
EQT0525	MS-4801 - LUWA Bottoms Level - MS-4801				Recycled back to process	8760 hr/yr (All Year)
EQT0526	MS-4856 - FFE Demister - MS-4856				Recycled back to process	8760 hr/yr (All Year)
EQT0527	MS-4814 - Precursor Level Pot - MS-4814				Recycled back to process	8760 hr/yr (All Year)
EQT0528	MS-4107 - Amine Brine Receiver - MS-4107				Recycled back to process	8760 hr/yr (All Year)
EQT0529	MS-6107B - Amine Brine Receiver - MS-6107B				Recycled back to process	8760 hr/yr (All Year)
EQT0530	MF-4209A - MCB Storage - MF-4209A				Recycled back to process	8760 hr/yr (All Year)
EQT0531	MF-4209B - MCB Storage - MF-4209B				Recycled back to process	8760 hr/yr (All Year)
EQT0532	MF-6209A - MCB Storage - MF-6209A				Recycled back to process	8760 hr/yr (All Year)
EQT0533	MF-6209B - MCB Storage - MF-6209B				Recycled back to process	8760 hr/yr (All Year)
EQT0534	MF-9209A - MCB Storage - MF-9209A				Recycled back to process	8760 hr/yr (All Year)
EQT0535	MF-9209B - MCB Storage - MF-9209B				Recycled back to process	8760 hr/yr (All Year)
EQT0536	MS-4155 - Settling Feed Tank - MS-4155				Recycled back to process	8760 hr/yr (All Year)
EQT0537	MS-6155 - Settling Feed Tank - MS-6155				Recycled back to process	8760 hr/yr (All Year)
EQT0538	MM-4104 - Graesser Washer Weir Pot - MM-4104				Recycled back to process	8760 hr/yr (All Year)
EQT0539	MM-6104 - Graesser Washer Weir Pot - MM-6104				Recycled back to process	8760 hr/yr (All Year)
EQT0540	MM-4105 - Extractor Weir Pot - MM-4105				Recycled back to process	8760 hr/yr (All Year)
EQT0541	MM-6105 - Extractor Weir Pot - MM-6105				Recycled back to process	8760 hr/yr (All Year)
EQT0542	MM-4106 - Amine Water/Amine Separator Weir Box - MM-4106				Recycled back to process	8760 hr/yr (All Year)
EQT0543	MM-6106 - Amine Water/Amine Separator Weir Box - MM-6106				Recycled back to process	8760 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
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 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0544	MS-4402 - Economizer - MS-4402				Recycled back to process	8760 hr/yr (All Year)
EQT0548	MS-4109 - DADPM Buffer - MS-4109					8760 hr/yr (All Year)
EQT0549	MS-6109 - DADPM Buffer - MS-6109					8760 hr/yr (All Year)
EQT0550	MS-4110 - Decanter - MS-4110					8760 hr/yr (All Year)
EQT0551	MS-6110 - Decanter - MS-6110					8760 hr/yr (All Year)
EQT0554	MS-6212 - Conc. Crude Storage - MS-6212					8760 hr/yr (All Year)
EQT0555	MS-9212 - Conc. Crude Storage - MS-9212					8760 hr/yr (All Year)
EQT0556	MS-4162 - Rafflux - MS-4162					8760 hr/yr (All Year)
EQT0557	MS-6162 - Rafflux - MS-6162					8760 hr/yr (All Year)
EQT0558	MS-4154 - Vacuum Pump Receiver - MS-4154				Recycled back to process	8760 hr/yr (All Year)
EQT0559	MS-6154 - Vacuum Pump Receiver - MS-6154				Recycled back to process	8760 hr/yr (All Year)
EQT0560	MS-4214 - Cont. Column Reflux - MS-4214					8760 hr/yr (All Year)
EQT0561	MS-6214 - Cont. Cond. Reflux - MS-6214					8760 hr/yr (All Year)
EQT0562	MS-9214 - Conc. Cond. Reflux - MS-9214					8760 hr/yr (All Year)
EQT0563	MS-6245 - PI Stripper Reflux - MS-6245					8760 hr/yr (All Year)
EQT0564	MS-4157 - Extractor Level Control - MS-4157					8760 hr/yr (All Year)
EQT0565	MS-6157 - Extractor Level Control - MS-6157					8760 hr/yr (All Year)
EQT0566	MS-4159 - Amine Brine Buffer Tank - MS-4159					8760 hr/yr (All Year)
EQT0568	MS-6159 - Amine Brine Buffer Tank - MS-6159					8760 hr/yr (All Year)
EQT0569	MS-4207 - Phosgene Mixing Vessel - MS-4207					8760 hr/yr (All Year)
EQT0570	MS-4404 - Phosgene Absorber Emergency Storage - MS-4404					8760 hr/yr (All Year)
EQT0571	MS-6310 - Phosgene Absorber Emergency Storage - MS-6310					8760 hr/yr (All Year)
EQT0572	MS-9310 - Phosgene Absorber Emergency Storage - MS-9310					8760 hr/yr (All Year)
EQT0573	MS-4403 - Phosgene Level Pot - MS-4403					8760 hr/yr (All Year)
EQT0574	MS-4211 - Recovery Column Feed - MS-4211					8760 hr/yr (All Year)
EQT0575	MS-6211 - Recovery Column Feed - MS-6211					8760 hr/yr (All Year)
EQT0576	MS-9211 - Recovery Column Feed - MS-9211					8760 hr/yr (All Year)
EQT0577	MS-9704 - Hot MCB Circulation Tank - MS-9704					8760 hr/yr (All Year)
EQT0578	MR-6207 - PI Batch Reactor - MR-6207					8760 hr/yr (All Year)
EQT0579	MR-4201 - MDI 1 Phosgenation Reactor Operation - MR-4201					8760 hr/yr (All Year)
EQT0580	MR-4202 - MDI 1 Phosgenation Reactor Operation - MR-4202					8760 hr/yr (All Year)
EQT0581	MR-4203 - MDI 1 Phosgenation Reactor Operation - MR-4203					8760 hr/yr (All Year)
EQT0582	MR-4204 - MDI 1 Phosgenation Reactor Operation - MR-4204					8760 hr/yr (All Year)
EQT0583	MR-6201 - MDI 2 Phosgenation Reactor Operation - MR-6201					8760 hr/yr (All Year)
EQT0584	MR-6202 - MDI 2 Phosgenation Reactor Operation - MR-6202					8760 hr/yr (All Year)
EQT0585	MR-6203 - MDI 2 Phosgenation Reactor Operation - MR-6203					8760 hr/yr (All Year)
EQT0586	MR-6204 - MDI 2 Phosgenation Reactor Operation - MR-6204					8760 hr/yr (All Year)
EQT0587	MR-4401A - Phosgene Reactor Operation - MR-4401A					8760 hr/yr (All Year)
EQT0588	MR-4401B - Phosgene Reactor Operation - MR-4401B					8760 hr/yr (All Year)
EQT0589	MR-4401C - Phosgene Reactor Operation - MR-4401C					8760 hr/yr (All Year)

INVENTORIES

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 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT0590	MR-4401D - Phosgene Reactor Operation - MR-4401D					8760 hr/yr (All Year)
EQT0591	MR-4105A - MDI 1 DADPM Batch Operation - MR-4105A					8760 hr/yr (All Year)
EQT0592	MR-4105B - MDI 1 DADPM Batch Operation - MR-4105B					8760 hr/yr (All Year)
EQT0593	MR-4106 - MDI 1 Neutralizer - MR-4106					8760 hr/yr (All Year)
EQT0594	MR-4210 - Fixed Probe - Reactor 1A - MR-4210					8760 hr/yr (All Year)
EQT0595	MR-6105A - MDI 2 DADPM Batch Operation - MR-6105A					8760 hr/yr (All Year)
EQT0597	MR-6105B - MDI 2 DADPM Batch Operation - MR-6105B					8760 hr/yr (All Year)
EQT0598	MR-6105C - MDI 2 DADPM Batch Operation - MR-6105C					8760 hr/yr (All Year)
EQT0599	MR-6105D - MDI 2 DADPM Batch Operation - MR-6105D					8760 hr/yr (All Year)
EQT0600	MR-6105E - MDI 2 DADPM Continuous Operation - MR-6105E					8760 hr/yr (All Year)
EQT0601	MR-6105F - MDI 2 DADPM Continuous Operation - MR-6105F					8760 hr/yr (All Year)
EQT0602	MR-6106 - Neutralizer - MR-6106					8760 hr/yr (All Year)
EQT0603	MR-6108C - Neutralizer - MR-6108C					8760 hr/yr (All Year)
EQT0604	MR-6107 - Neutralizer - MR-6107					8760 hr/yr (All Year)
EQT0605	MR-9201 - MDI 3 Phosgenation Reactor Operation - MR-9201					8760 hr/yr (All Year)
EQT0606	MR-9202 - MDI 3 Phosgenation Reactor Operation - MR-9202					8760 hr/yr (All Year)
EQT0607	MR-9203 - MDI 3 Phosgenation Reactor Operation - MR-9203					8760 hr/yr (All Year)
EQT0608	MR-9204 - MDI 3 Phosgenation Reactor Operation - MR-9204					8760 hr/yr (All Year)
EQT0609	MR-9401A - Phosgene Reactor Operation - MR-9401A					8760 hr/yr (All Year)
EQT0610	MR-9401B - Phosgene Reactor Operation - MR-9401B					8760 hr/yr (All Year)
EQT0611	MR-9401C - Phosgene Reactor Operation - MR-9401C					8760 hr/yr (All Year)
EQT0612	AS-4101 - DADPM Stripper Distillation Column - AS-4101					8760 hr/yr (All Year)
EQT0613	AS-4103 - Amine Brine Stripper - AS-4103					8760 hr/yr (All Year)
EQT0614	AS-4104 - Methanol F Fractionator - AS-4104					8760 hr/yr (All Year)
EQT0615	AS-4800 - Pure 1 Splitting Distillation Column - AS-4800					8760 hr/yr (All Year)
EQT0616	AS-6701 - Pure 2 Splitting Distillation Column - AS-6701					8760 hr/yr (All Year)
EQT0617	AS-6205 - PI Stripper Column - AS-6205					8760 hr/yr (All Year)
EQT0618	AS-6202 - MDI Purification Distillation Column - AS-6202					8760 hr/yr (All Year)
EQT0619	AS-6203 - MDI Purification Distillation Column - AS-6203					8760 hr/yr (All Year)
EQT0620	AS-6201 - MDI 2 MCB Recovery Distillation Column - AS-6201					8760 hr/yr (All Year)
EQT0621	MS-6210 - MDI 2 MCB Recovery Distillation Column - MS-6210					8760 hr/yr (All Year)
EQT0622	AS-6301 - MDI 2 Phosgene Absorber Column - AS-6301					8760 hr/yr (All Year)
EQT0623	AS-4201 - MDI 1 MCB Recovery Distillation Column - AS-4201					8760 hr/yr (All Year)
EQT0624	MS-4210 - MDI 1 MCB Recovery Distillation Column - MS-4210					8760 hr/yr (All Year)
EQT0625	AS-4301 - MDI 1 Phosgene Absorber Column - AS-4301					8760 hr/yr (All Year)
EQT0626	AS-4202 - MDI 1 MDI 1 Purification Distillation Column - AS-4202					8760 hr/yr (All Year)
EQT0627	AS-4203 - MDI 1 Phosgene Absorber Column - AS-4203					8760 hr/yr (All Year)
EQT0628	AS-6101 - DADPM 2 DADPM Stripper Distillation Column - AS-6101					8760 hr/yr (All Year)
EQT0629	AS-6103 - Effluent Recovery Distillation Column - AS-6103					8760 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0630	AS-6104 - Effluent Recovery Distillation Column - AS-6104					8760 hr/yr (All Year)
EQT0632	AS-9201 - MDI 3 MCB Recovery Distillation Column - AS-9201					8760 hr/yr (All Year)
EQT0633	MS-9210 - MDI 3 MCB Recovery Distillation Column - MS-9210					8760 hr/yr (All Year)
EQT0634	AS-9301 - MDI 3 Phosgene Absorber Column - AS-9301					8760 hr/yr (All Year)
EQT0635	AS-9202 - MDI 3 MDI Purification Distillation Column - AS-9202					8760 hr/yr (All Year)
EQT0636	AS-9203 - MDI 3 MDI Purification Distillation Column - AS-9203					8760 hr/yr (All Year)
EQT0637	AS-9702 - Pure 3 Lights Removal Column - AS-9702					8760 hr/yr (All Year)
EQT0638	AS-9701 - Heavies Removal Column - AS-9701					8760 hr/yr (All Year)
EQT0639	AS-9204 - HCl Clean-up Column - AS-9204					8760 hr/yr (All Year)
EQT0640	MS-4216 - MDI Cooler - MS-4216					8760 hr/yr (All Year)
EQT0641	Loading - MDI/HCl Loading					8760 hr/yr (All Year)
EQT0642	MS-6216 - MDI Cooler - MS-6216					8760 hr/yr (All Year)
EQT0643	MR-4212 - Bed 2A					8760 hr/yr (All Year)
EQT0644	MR-4213 - Bed 2B					8760 hr/yr (All Year)
EQT0645	MR-4215 - Bed 4					8760 hr/yr (All Year)
EQT0646	MR-4216 - SR					8760 hr/yr (All Year)
EQT0652	GU-4104 - Effluent Extractor - GU-4104					8760 hr/yr (All Year)
EQT0653	GU-6104 - Effluent Extractor - GU-6104					8760 hr/yr (All Year)
EQT0654	MR-4211 - Bed 1B					8760 hr/yr (All Year)
EQT0656	HCl Loading - HCl Tank Truck/Railcar Loading					8760 hr/yr (All Year)
EQT0657	TT-4211A - Economizer - TT-4211A					8760 hr/yr (All Year)
EQT0658	TT-4211B - Economizer - TT-4211B					8760 hr/yr (All Year)
EQT0659	GY-4110 - In-line Water Heater - GY-4110					8760 hr/yr (All Year)
EQT0660	GY-6110 - In-line Water Heater - GY-6110					8760 hr/yr (All Year)
EQT0661	TT-4829 - Tempered Water Cooler - TT-4829					8760 hr/yr (All Year)
EQT0662	TT-4831 - Variants Reactor Water Cooler - TT-4831					8760 hr/yr (All Year)
EQT0663	TT-4841 - Variants Reactor Water Cooler - TT-4841					8760 hr/yr (All Year)
EQT0664	TT-4214A - Pump Out Unit Condenser - TT-4214A					8760 hr/yr (All Year)
EQT0665	TT-4214B - Pump Out Unit Condenser - TT-4214B					8760 hr/yr (All Year)
EQT0666	TT-6550 - Pump Out Unit Condenser - TT-6550					8760 hr/yr (All Year)
EQT0667	TT-6551 - Refrigeration Condenser - TT-6551					8760 hr/yr (All Year)
EQT0668	TT-6552 - Refrigeration Economizer - TT-6552					8760 hr/yr (All Year)
EQT0669	TT-4859 - 1st Surface Condenser - TT-4859					8760 hr/yr (All Year)
EQT0670	TT-4860 - 2nd Surface Condenser - TT-4860					8760 hr/yr (All Year)
EQT0671	TT-4861 - 3rd Surface Condenser - TT-4861					8760 hr/yr (All Year)
EQT0672	TT-4863 - Variants Reactor F Cooler and Heater - TT-4863					8760 hr/yr (All Year)
EQT0673	TT-4864 - Variants Reactor F Cooler and Heater - TT-4864					8760 hr/yr (All Year)
EQT0674	TT-9705 - Tempered Water Cooler - TT-9705					8760 hr/yr (All Year)
EQT0675	TT-9707 - Crystallizer HFM Heater - TT-9707					8760 hr/yr (All Year)
EQT0676	TT-9320 - HCl Compressor Lube Oil Cooler - TT-9320					8760 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0677	TT-4832 - Water System Exchanger - TT-4832				Recycled back to process	8760 hr/yr (All Year)
EQT0678	TT-4946 - 2nd Blender Water Cooler - TT-4946				Recycled back to process	8760 hr/yr (All Year)
EQT0679	TT-4404A - Phosgene Reactor Cooler - TT-4404A					8760 hr/yr (All Year)
EQT0680	TT-4404B - Phosgene Reactor Cooler - TT-4404B					8760 hr/yr (All Year)
EQT0681	TT-4404C - Phosgene Reactor Cooler - TT-4404C					8760 hr/yr (All Year)
EQT0682	TT-4404D - Phosgene Reactor Cooler - TT-4404D					8760 hr/yr (All Year)
EQT0683	TT-9404A - Phosgene Reactor Cooler - TT-9404A					8760 hr/yr (All Year)
EQT0684	TT-9404B - Phosgene Reactor Cooler - TT-9404B					8760 hr/yr (All Year)
EQT0685	PC-9316D - Refrigeration System Condenser - PC-9316D					8760 hr/yr (All Year)
EQT0686	PC-9316F - Economizer - PC-9316F					8760 hr/yr (All Year)
EQT0687	PC-9316J - Oil Cooler - PC-9316J					8760 hr/yr (All Year)
EQT0688	PC-9316P - Oil Cooler - PC-9316P					8760 hr/yr (All Year)
EQT0689	TT-4302 - HCl Absorber Condenser - TT-4302					8760 hr/yr (All Year)
EQT0690	TT-4302S - HCl Absorber Condenser - TT-4302S					8760 hr/yr (All Year)
EQT0691	TT-6302A - HCl Absorber Condenser - TT-6302A					8760 hr/yr (All Year)
EQT0692	TT-6302B - HCl Absorber Condenser - TT-6302B					8760 hr/yr (All Year)
EQT0693	TT-9302A - HCl Absorber Condenser - TT-9302A					8760 hr/yr (All Year)
EQT0694	TT-9302S - HCl Absorber Condenser - TT-9302S					8760 hr/yr (All Year)
EQT0695	TT-6309 - HCl Concentrator - TT-6309					8760 hr/yr (All Year)
EQT0696	TT-9309 - HCl Concentrator - TT-9309					8760 hr/yr (All Year)
EQT0697	TT-4303A - HCl Absorber Bottoms Cooler - TT-4303A					8760 hr/yr (All Year)
EQT0698	TT-4303B - HCl Absorber Bottoms Cooler - TT-4303B					8760 hr/yr (All Year)
EQT0699	TT-6303A - HCl Absorber Bottoms Cooler - TT-6303A					8760 hr/yr (All Year)
EQT0700	TT-6303B - HCl Absorber Bottoms Cooler - TT-6303B					8760 hr/yr (All Year)
EQT0701	TT-9303A - HCl Absorber Bottoms Cooler - TT-9303A					8760 hr/yr (All Year)
EQT0702	TT-9303B - HCl Absorber Bottoms Cooler - TT-9303B					8760 hr/yr (All Year)
EQT0703	TT-9318 - HCl Clean-up Column Condenser - TT-9318					8760 hr/yr (All Year)
EQT0719	TT-6709 - Tamped Water Cooler - TT-6709					8760 hr/yr (All Year)
EQT0720	GY-6701 - Hot Water Heater - GY-6701					8760 hr/yr (All Year)
EQT0721	TT-6708 - Hot Water Cooler - TT-6708					8760 hr/yr (All Year)
EQT0722	GY-6702 - Tempered Water Heater - GY-6702					8760 hr/yr (All Year)
EQT0723	TT-9311 - Fine Scrubber Circulation Cooler - TT-9311					8760 hr/yr (All Year)
EQT0724	TT-9703 - Distillate Cooler - TT-9703					8760 hr/yr (All Year)
EQT0725	TS-4112 - Seal Flush Tank Coil Plates - TS-4112					8760 hr/yr (All Year)
EQT0726	GJ-6701 - Condenser for Electors - GJ-6701					8760 hr/yr (All Year)
EQT0727	GJ-6702 - Condenser for Electors - GJ-6702					8760 hr/yr (All Year)
EQT0728	GJ-6703 - Condenser for Electors - GJ-6703					8760 hr/yr (All Year)
EQT0729	TT-6704 - Pure MDI Condenser - TT-6704					8760 hr/yr (All Year)
EQT0730	GJ-6705 - Condenser for Electors - GJ-6705					8760 hr/yr (All Year)
EQT0731	GJ-6706 - Condenser for Electors - GJ-6706					8760 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0732	GJ-6707 - Condenser for Ejectors - GJ-6707					8760 hr/yr (All Year)
EQT0733	GJ-6708 - Condenser for Ejectors - GJ-6708					8760 hr/yr (All Year)
EQT0734	GJ-6709 - Condenser for Ejectors - GJ-6709					8760 hr/yr (All Year)
EQT0735	GJ-6710 - Condenser for Ejectors - GJ-6710					8760 hr/yr (All Year)
EOT036	TT-4106 - DADPM Stripper Condenser - TT-4106					8760 hr/yr (All Year)
EQT0737	TT-6106 - DADPM Stripper Condenser - TT-6106					8760 hr/yr (All Year)
EQT0738	TT-4121 - Amine Water/Amiline Cooler - TT-4121					8760 hr/yr (All Year)
EQT0739	TT-6121 - Amine Water/Amiline Cooler - TT-6121					8760 hr/yr (All Year)
EQT0740	TT-4121 - MeOH Condenser - TT-4121					8760 hr/yr (All Year)
EQT0741	TT-6121 - MeOH Condenser - TT-6121					8760 hr/yr (All Year)
EQT0742	TT-4125 - Vacuum Pump Liquid Cooler - TT-4125					8760 hr/yr (All Year)
EQT0743	TT-6125 - Vacuum Pump Liquid Cooler - TT-6125					8760 hr/yr (All Year)
EOT0745	TT-4127 - Neutralizer Venti Condenser - TT-4127					8760 hr/yr (All Year)
EQT0746	TT-6104 - Neutralizer Venti Condenser - TT-6104					8760 hr/yr (All Year)
EQT0747	TT-6104C - Neutralizer Venti Condenser - TT-6104C					8760 hr/yr (All Year)
EQT0748	TT-4260 - Recovery Column Offgas Condenser - TT-4260					8760 hr/yr (All Year)
EOT0749	TT-6260 - Recovery Column Offgas Condenser - TT-6260					8760 hr/yr (All Year)
EQT0750	TT-4102A - Reactor Venti Condenser - TT-4102A					8760 hr/yr (All Year)
EOT0751	TT-4102B - Reactor Venti Condenser - TT-4102B					8760 hr/yr (All Year)
EQT0752	TT-4802 - Distillate Cooler - TT-4802					8760 hr/yr (All Year)
EQT0753	TT-4803 - Distillate Condenser - TT-4803					8760 hr/yr (All Year)
EOT0754	TT-4804 - 1st Guard Condenser - TT-4804					8760 hr/yr (All Year)
EOT0755	TT-6703 - Mixed Isomer Condenser - TT-6703					8760 hr/yr (All Year)
EQT0757	TT-6704 - Mixed Isomer Cooler - TT-6704					8760 hr/yr (All Year)
EQT0758	TT-4805A - 2nd Guard Condenser - TT-4805A					8760 hr/yr (All Year)
EOT0759	Dissocrystallizer - Dissocrystallizer Bundle					8760 hr/yr (All Year)
EOT0760	TT-4119 - DADPM Stripper Bottoms Cooler - TT-4119					8760 hr/yr (All Year)
EQT0761	TT-6119 - DADPM Stripper Bottoms Cooler - TT-6119					8760 hr/yr (All Year)
EQT0762	TT-4128 - MeOH Bottoms Cooler - TT-4128					8760 hr/yr (All Year)
EQT0763	TT-6128 - MeOH Bottoms Cooler - TT-6128					8760 hr/yr (All Year)
EOT0764	TT-6102A - DADPM Reactor Venti Condenser - TT-6102A					8760 hr/yr (All Year)
EOT0765	TT-6102B - DADPM Reactor Venti Condenser - TT-6102B					8760 hr/yr (All Year)
EOT0766	TT-6102C - DADPM Reactor Venti Condenser - TT-6102C					8760 hr/yr (All Year)
EOT0767	TT-6102D - DADPM Reactor Venti Condenser - TT-6102D					8760 hr/yr (All Year)
EOT0768	TT-6102E - DADPM Reactor Venti Condenser - TT-6102E					8760 hr/yr (All Year)
EOT0769	TT-6102F - DADPM Reactor Venti Condenser - TT-6102F					8760 hr/yr (All Year)
EOT0776	TT-4207 - MCB Cooler - TT-4207					8760 hr/yr (All Year)
EOT0777	TT-6207 - MCB Cooler - TT-6207					8760 hr/yr (All Year)
EOT0778	TT-9207 - MCB Cooler - TT-9207					8760 hr/yr (All Year)
EOT0779	TT-9704 - MCB Cooler - TT-9704					8760 hr/yr (All Year)

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-V09
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0780	TT-9260 - Recovery Column Off Gas Condenser - TT-9260					8760 hr/yr (All Year)
EQT0781	TT-9315A - HCl Compressor 1st Intercooler - TT-9315A					8760 hr/yr (All Year)
EQT0782	TT-9315B - HCl Compressor 2nd Intercooler - TT-9315B					8760 hr/yr (All Year)
EQT0783	TT-9316 - HCl Compressor Aftercooler - TT-9316					8760 hr/yr (All Year)
EQT0785	TT-4213 - Product Cooler - TT-4213					8760 hr/yr (All Year)
EQT0786	TT-6276 - Product Cooler - TT-6276					8760 hr/yr (All Year)
EQT0787	TT-9276 - Product Cooler - TT-9276					8760 hr/yr (All Year)
EQT0788	TT-4509 - EDMI Reactor Cooler - TT-4509					8760 hr/yr (All Year)
EQT0789	TT-4801A - Crash Cooler - TT-4801A					8760 hr/yr (All Year)
EQT0790	TT-4801S - Crash Cooler - TT-4801S					8760 hr/yr (All Year)
EQT0791	TT-4101A - DADPM Reactor Cooler - TT-4101A					8760 hr/yr (All Year)
EQT0792	TT-4101B - DADPM Reactor Cooler - TT-4101B					8760 hr/yr (All Year)
EQT0793	TT-6101A - DADPM Reactor Cooler - TT-6101A					8760 hr/yr (All Year)
EQT0794	TT-6101B - DADPM Reactor Cooler - TT-6101B					8760 hr/yr (All Year)
EQT0795	TT-6101C - DADPM Reactor Cooler - TT-6101C					8760 hr/yr (All Year)
EQT0796	TT-6101D - DADPM Reactor Cooler - TT-6101D					8760 hr/yr (All Year)
EQT0797	TT-6101E - DADPM Reactor Cooler - TT-6101E					8760 hr/yr (All Year)
EQT0798	TT-6101F - DADPM Reactor Cooler - TT-6101F					8760 hr/yr (All Year)
EQT0799	TT-4401 - Phosgene Reactor Condenser - TT-4401					8760 hr/yr (All Year)
EQT0800	TT-9401 - Phosgene Reactor Condenser - TT-9401					8760 hr/yr (All Year)
EQT0801	TT-6311 - Flume Scrubber Cooler - TT-6311					8760 hr/yr (All Year)
EQT0803	TT-9722 - 3rd Stage Condenser - TT-9722					8760 hr/yr (All Year)
EQT0804	TT-9723 - 4th Stage Condenser - TT-9723					8760 hr/yr (All Year)
EQT0805	TT-9724 - 5th Stage Condenser - TT-9724					8760 hr/yr (All Year)
EQT0806	TT-4241 - Condensate Cooler - TT-4241					8760 hr/yr (All Year)
EQT0807	TT-4247 - Solvent Wash Cooler - TT-4247					8760 hr/yr (All Year)
EQT0808	TT-4250 - DADPM Colder - TT-4250					8760 hr/yr (All Year)
EQT0809	TT-4251 - Reactor Intercooler - TT-4251					8760 hr/yr (All Year)
EQT0810	TT-4252 - C2 Intercooler - TT-4252					8760 hr/yr (All Year)
EQT0811	TT-4253 - Pilot Plant Vent Condenser - TT-4253					8760 hr/yr (All Year)
EQT0813	TT-4221A - Suction Separator KO - TT-4221A					Recycled back to process
EQT0814	MM-4301 - HCl Absorber Cond. KO - MM-4301					Recycled back to process
EQT0815	MM-4303 - HCl Absorber Cond. KO - MM-4303					Recycled back to process
EQT0816	MM-6301 - HCl Absorber Cond. KO - MM-6301					Recycled back to process
EQT0817	PC-9316G - Refrigeration System Suction KO - PC-9316G					8760 hr/yr (All Year)
EQT0818	MM-4304 - Caustic Scrubber Header KO - MM-4304					8760 hr/yr (All Year)
EQT0819	MM-6304 - Caustic Scrubber Header KO - MM-6304					8760 hr/yr (All Year)
EQT0820	MM-9304 - Caustic Scrubber Header KO - MM-9304					8760 hr/yr (All Year)
EQT0821	MS-4205 - Reactor Air Cond. Separator KO - MS-4205					Recycled back to process
EQT0822	MS-6205 - Reactor Air Cond. Separator KO - MS-6205					Recycled back to process

INVENTORIES

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 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0823	MS-9205 - Reactor Air Cond. Separator KO - MS-9205			Recycled back to process	8760 hr/yr (All Year)	
EQT0824	MS-4229 - Vacuum Pump Separator KO - MS-4229			Recycled back to process	8760 hr/yr (All Year)	
EQT0825	MS-6229 - Vacuum Pump Separator KO - MS-6229			Recycled back to process	8760 hr/yr (All Year)	
EQT0826	MS-9229 - Vacuum Pump Separator KO - MS-9229			Recycled back to process	8760 hr/yr (All Year)	
EQT0827	MS-6702 - MCB Flash KO - MS-6702			Recycled back to process	8760 hr/yr (All Year)	
EQT0828	MS-6150 - DADPM Reaction Vent KO - MS-6150			Recycled back to process	8760 hr/yr (All Year)	
EQT0829	MS-4309 - Phosgene Absorber KO - MS-4309			Recycled back to process	8760 hr/yr (All Year)	
EQT0830	MS-6309 - Phosgene Absorber KO - MS-6309			Recycled back to process	8760 hr/yr (All Year)	
EQT0831	MS-9309 - Phosgene Absorber KO - MS-9309			Recycled back to process	8760 hr/yr (All Year)	
EQT0832	MS-9315 - HCl Compressor Suction KO - MS-9315			Recycled back to process	8760 hr/yr (All Year)	
EQT0833	MR-4214 - Bed 3			Recycled back to process	8760 hr/yr (All Year)	
EQT0834	MM-4204 - Vacuum Pump Carbate Cooler - MM-4204			Recycled back to process	8760 hr/yr (All Year)	
EQT0835	MM-6204 - Vacuum Pump Separator KO - MM-6204			Recycled back to process	8760 hr/yr (All Year)	
EQT0836	MM-4108 - OH Cond. KO - MM-4108			Recycled back to process	8760 hr/yr (All Year)	
EQT0837	MM-6201 - Rec. Col. KO - MM-6201			Recycled back to process	8760 hr/yr (All Year)	
EQT0838	MM-6202 - Rec. Col. KO - MM-6202			Recycled back to process	8760 hr/yr (All Year)	
EQT0839	MM-K10 - Off Gas Cond. - MM-K10			Recycled back to process	8760 hr/yr (All Year)	
EQT0840	MM-K10A - Rec. Column KO Vessel - MM-K10A			Recycled back to process	8760 hr/yr (All Year)	
EQT0841	MM-6305 - Rec. Column KO Vessel - MM-6305			Recycled back to process	8760 hr/yr (All Year)	
EQT0842	PE-315 - Rec. Column KO Vessel - PE-315			Recycled back to process	8760 hr/yr (All Year)	
EQT0843	PE-9315 - Phosgene Analyzer KO - PE-9315			Recycled back to process	8760 hr/yr (All Year)	
EQT0844	MM-9201 - MCB Recovery Column KO - MM-9201			Recycled back to process	8760 hr/yr (All Year)	
EQT0845	MM-9202 - MCB Recovery Column KO - MM-9202			Recycled back to process	8760 hr/yr (All Year)	
EQT0846	MS-9228 - Concentrator Column Feed Flash Drum - MS-9228			Recycled back to process	8760 hr/yr (All Year)	
EQT0847	MM-K5 - Deltio Cond. Separator KO - MM-K5			Recycled back to process	8760 hr/yr (All Year)	
EQT0848	MS-9243A - Dechlorinator Condenser Separator - MS-9243A			Recycled back to process	8760 hr/yr (All Year)	
EQT0849	MS-9243B - Dechlorinator Condenser Separator - MS-9243B			Recycled back to process	8760 hr/yr (All Year)	
EQT0850	MM-9301 - HCl Absorber KO - MM-9301			Recycled back to process	8760 hr/yr (All Year)	
EQT0851	MM-9303 - HCl Absorber KO - MM-9303			Recycled back to process	8760 hr/yr (All Year)	
EQT0852	MM-6303 - HCl Absorber Cond. KO - MM-6303			Recycled back to process	8760 hr/yr (All Year)	
EQT0853	MM-6228 - Conc. Feed Flash Drum - MM-6228			Recycled back to process	8760 hr/yr (All Year)	
EQT0854	MM-4243 - Conc. Feed Flash Drum - MM-4243			Recycled back to process	8760 hr/yr (All Year)	
EQT0855	MM-6243A - Conc. Feed Flash Drum - MM-6243A			Recycled back to process	8760 hr/yr (All Year)	
EQT0856	MM-6243B - Conc. Feed Flash Drum - MM-6243B			Recycled back to process	8760 hr/yr (All Year)	
EQT0857	MS-4228 - Conc. Col. Flash Feed KO - MS-4228			Recycled back to process	8760 hr/yr (All Year)	
EQT0858	MS-4150 - DADPM Reaction Vent KO - MS-4150			Recycled back to process	8760 hr/yr (All Year)	
EQT0859	MM-9204 - Vacuum Pump Separator Cond. KO - MM-9204			Recycled back to process	8760 hr/yr (All Year)	
EQT0860	MS-6551 - Vacuum Pump Separator Cond. KO - MS-6551			Recycled back to process	8760 hr/yr (All Year)	
EQT0861	MS-9551 - Vacuum Pump Separator Cond. KO - MS-9551			Recycled back to process	8760 hr/yr (All Year)	
EQT0864	MS-4156 - Amine Water/Aniline Separator - MS-4156			Recycled back to process	8760 hr/yr (All Year)	

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
EQT0855	MS-6156 - Amine Water/Aniline Separator - MS-6156				Recycled back to process	8760 hr/yr (All Year)
EQT0858	TT-4129 - Methanol Fractionator Vent Condenser - TT-4129					8760 hr/yr (All Year)
EQT0871	TT-4402 - Phosgene Vent Condenser - TT-4402					8760 hr/yr (All Year)
EQT0872	TT-4402 - Phosgene Vent Condenser - TT-4402					8760 hr/yr (All Year)
EQT0873	TT-6123 - DADPM Plant Vent Condenser - TT-6123					8760 hr/yr (All Year)
EQT0874	TT-6129 - Methanol Fractionator Vent Condenser - TT-6129					8760 hr/yr (All Year)
EQT0896	AS-6117 A - DADPM Continuous Isomerization Column					8760 hr/yr (All Year)
EQT0897	AS-6117 B - DADPM Continuous Isomerization Column					8760 hr/yr (All Year)
EQT0898	AS-6112 - CDU HCl Absorber Column					8760 hr/yr (All Year)
EQT0899	MM-6122 - Neutralizer Separator Weir Box	220 gallons				8760 hr/yr (All Year)
EQT0900	MR-6111 - MR-6111 - CDU Feed Drum					8760 hr/yr (All Year)
EQT0901	MR-6124 - Neutralizer					8760 hr/yr (All Year)
EQT0902	MS-6121 - Neutralizer Separator	55706 gallons				8760 hr/yr (All Year)
EQT0903	TT-6116A - CDU Cooler					8760 hr/yr (All Year)
EQT0904	TT-6116B - CDU Cooler					8760 hr/yr (All Year)
EQT0905	TT-6116C - CDU Cooler					8760 hr/yr (All Year)
EQT0906	TT-6116D - CDU Cooler					8760 hr/yr (All Year)
EQT0907	TT-9XXX - Secondary Refrigeration Condenser					8760 hr/yr (All Year)
EQT0908	AS-4302 - MDI 1 HCl Absorber					8760 hr/yr (All Year)
EQT0909	AS-6302 - MDI 2 HCl Absorber					8760 hr/yr (All Year)
EQT0910	AS-9302 - MDI 3 HCl Absorber					8760 hr/yr (All Year)
EQT0911	MS-4302A - HCl Day Tank - MS-4302A					8760 hr/yr (All Year)
EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance		300 gallons/min	10 gallons/min		8760 hr/yr (All Year)
EQT1194	MF-571A - HCl Storage Tank MF-571A	59955 gallons			(None Specified)	(None Specified)
EQT1195	MF-572A - HCl Storage Tank MF-572A	59955 gallons			(None Specified)	(None Specified)
EQT1196	MF-573A - HCl Storage Tank MF-573A	169866 gallons			(None Specified)	(None Specified)
EQT1197	Loading - HCl Storage Tank Truck Loading					8760 hr/yr (All Year)
EQT1198	MF-571B - HCl Storage Tank MF-571B	59955 gallons				8760 hr/yr (All Year)
EQT1199	MF-572B - HCl Storage Tank MF-572B	59955 gallons				8760 hr/yr (All Year)
EQT1200	MF-573B - HCl Storage Tank MF-573B	169866 gallons				8760 hr/yr (All Year)
FUG0020	KS - MDI Plant Fugitive Emissions				59.24 MM gallons/yr	8760 hr/yr (All Year)
FUG0021	ZU - Wastewater System Fugitives				192.16 MM gallons/yr	8760 hr/yr (All Year)
RLP0032	KD - MDI Test Tanks Vent				159.84 MM gallons/yr	8760 hr/yr (All Year)
RLP0033	KF - KF - MDI 1 Aniline Storage Vent Seal Pot MMk1A				10.34 MM gallons/yr	8760 hr/yr (All Year)
RLP0034	KH - MDI 1 DADPM Tanks Vent	131442 gallons			83.5 MM gallons/yr	8760 hr/yr (All Year)
RLP0035	KQ - MDI Bulk Tank Common Vent 1	82771 gallons			59.24 MM gallons/yr	8760 hr/yr (All Year)
RLP0036	KV - MDI Bulk Tanks Common Vent 2	197472 gallons			36 MM gallons/yr	8760 hr/yr (All Year)
RLP0037	MB - MDI 2 Test Tanks Vent	46062 gallons			205685 gallons	8760 hr/yr (All Year)
RLP0038	MC - MDI Bulk Tanks Common Vent 3	22139 gallons			23.2 MM gallons/yr	8760 hr/yr (All Year)
RLP0039	MD - Pure 2 MDI Day Tanks Vent					

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
MDI Plant						
RLP0040	MG - Variants Storage Common Vent 1	70820 gallons		9.1 MM gallons/yr		8760 hr/yr (All Year)
RLP0041	MH - Variants Storage Common Vent 2	50938 gallons		7.6 MM gallons/yr		8760 hr/yr (All Year)
RLP0042	MO - MDI Inventory Tanks Common Vent 1			136.23 MM gallons/yr		8760 hr/yr (All Year)
RLP0043	MY - Variants Product Storage Common Vent 1	161897 gallons		34.2 MM gallons/yr		8760 hr/yr (All Year)
RLP0044	NB - Pure 2 Crystallizer Tanks Vent	16381 gallons		49.03 MM gallons/yr		8760 hr/yr (All Year)
RLP0045	NC - Pure 2 Crystallizer Heat Transfer Tanks Vent	333568 gallons		4349.5 MM gallons/yr		8760 hr/yr (All Year)
RLP0046	ND - Pure 2 Distillate Hold and Test Tanks Vent	29212 gallons		27.34 MM gallons/yr		8760 hr/yr (All Year)
RLP0047	ZF - MDI 3 Distillate Test Tanks Vent	46052 gallons		59.24 MM gallons/yr		8760 hr/yr (All Year)
RLP0048	ZH - MDI 3 Inventory Tanks Vent	601621 gallons		98.4 MM gallons/yr		8760 hr/yr (All Year)
RLP0049	ZR - Distillate & Product Storage Tanks Vent	74973 gallons		64.51 MM gallons/yr		8760 hr/yr (All Year)
RLP0050	ZS - Pure MDI/MI-20 Storage Tank Vent	506638 gallons		28.73 MM gallons/yr		8760 hr/yr (All Year)
RLP0051	KI - Pure 1 Distillate Vent	33840 gallons		45.1 MM gallons/yr		8760 hr/yr (All Year)
RLP0052	ZL - DADPM 2 Storage Vessel and Separation Weir Vent	3345 gallons		39500 gallons/yr		8760 hr/yr (All Year)
Stack Information:						
ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)
MDI Plant						
EQT0369	KB - MDI 1 Flume Scrubber AS-4303A/B		17.73	1.17	96	100
EQT0370	KC - MDI 1 Caustic Scrubber AS-4304B	3.2	152	1	80	100
EQT0371	MS-4217A - Storage Vessel MS-4217A			.25	21	140
EQT0372	MS-4217B - Storage Vessel MS-4217B			.25	21	140
EQT0373	MS-4217C - Storage Vessel MS-4217C			.25	21	140
EQT0374	MS-4906 - Storage Vessel MS-4906			.25	21	140
EQT0375	MF-4118 - Storage Vessel MS-4118			.25	6	140
EQT0376	MM-4110 - Ailine/Water Separator Weir Box MM-4110			.25	6	140
EQT0377	MS-4115 - Ailine/Water Separator MS-4115			.25	6	140
EQT0378	MS-4118 - Wash Water Feed MS-4118			.25	6	140
EQT0379	MS-4121 - Wei Ailine Storage MS-4121			.25	6	140
EOT0380	MS-4122 - DADPM Stripper Overhead Seal Pot Tank MS-4122			.25	6	140
EQT0381	MS-4158 - Amine Water Pump Out Pot MS-4158			.25	6	140
EOT0382	KG - MDI Ammonia Solution Tank MF-4512			.17	27	100
EQT0383	MF-4223 - Storage Vessel MS-4223			.25	10	275
EQT0384	MF-4112A - Storage Vessel MS-4112A			.25	10	275
EOT0385	MF-4112B - Storage Vessel MS-4112B			.25	10	275
EQT0386	MF-4112C - Storage Vessel MS-4112C			.25	10	275

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
MDI Plant							
EQT0387	MF-4112D - Storage Vessel MS-4112D			.25		10	275
EQT0388	KJ - KJ - Pure 1 Bulk Tank MS-4910	5.62		.13		22	165
EQT0389	KK - Pure 1 Mother Liquor Bulk Tank MS-4913	2.91		.13		22	165
EQT0390	MS-4503A - Storage Vessel MS-4503A			.25		36	165
EQT0391	MS-4503B - Storage Vessel MS-4503B			.25		36	165
EQT0392	KT - DADPM Rail Car/Truck Loading			2		15	220
EQT0396	MF-4503C - Storage Vessel MS-4503C			.25		26	150
EQT0397	MF-4503D - Storage Vessel MS-4503D			.25		26	150
EQT0398	MF-4503E - Storage Vessel MS-4503E			.25		26	150
EQT0399	KZ - MI-50 Storage Tank MS-496B	.16	.47	.25		50	160
EQT0400	MA - MDI 2 Caustic Scrubber AS-6304B			.81		105	108
EQT0401	MF-5217A - Storage Vessel MF-5217A			.25		26	140
EQT0402	MF-5217B - Storage Vessel MF-5217B			.25		26	140
EQT0403	MF-4503H - Storage Vessel MF-4503H			.25		25	165
EQT0404	MF-4503I - Storage Vessel			.25		25	165
EQT0405	MF-5701A - Storage Vessel MF-5701A			.25		25	150
EQT0406	MF-5701B - Storage Vessel MF-5701B			.25		25	150
EQT0407	MF-5703A - Pure II Mixed Isomer Day Storage MF-5703A			.25		25	150
EQT0408	MS-4917 - Storage Vessel MS-4917			.13		26	160
EQT0409	MS-4918 - Storage Vessel MS-4918			.13		26	160
EQT0410	MS-4919 - Storage Vessel MS-4919			.13		26	160
EQT0411	MF-4517 - Storage Vessel MF-4517			.13		26	140
EQT0412	MF-4518 - Storage Vessel MF-4518			.13		26	140
EQT0413	MH-1 - Storage Vessel MF-4519			.43		41	140
EQT0414	MH-2 - EMDI Reactor MR-4513			3.81	3.03	13	29
EQT0415	MK - Variants Storage Tank MF-4945			.59	.17		125
EQT0416	MM - MDI Bulk Tank MF-4503F			.73	.59	.13	25
EQT0417	MN - MDI Bulk Tank MF-4503G			4.28	5.82	.17	27
EQT0418	MF-8245A - Storage Vessel MF-8245A			.85	1.16	.17	27
EQT0419	MF-8245B - Storage Vessel MF-8245B					.33	12
EQT0420	MQ - MDI Truck Loading/Unloading			14.25	19.41	.17	12
EQT0421	MR - MDI Forklift Loading/Unloading			11.65	15.87	.17	20
EQT0423	MW - Variants Reactor "D" MR-4841			.92	2.7	.25	50
EQT0424	MX - Variants Product Storage Tank MF-4503J			.53	1.55	.25	220
							140

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
EOT0425	MF-4503K - Storage Vessel MF-4503K	.25		.36		150	
EOT0426	MF-4503L - Storage Vessel MF-4503L	.25		.36		150	
EOT0427	MS-6801 - Storage Vessel MS-6801	.17		.40		145	
EOT0428	MS-6802 - Storage Vessel MS-6802	.17		.40		145	
EOT0429	MS-6803 - Storage Vessel MS-6803	.17		.40		145	
EOT0430	MS-6804 - Storage Vessel MS-6804	.17		.40		145	
EOT0431	MS-6805 - Storage Vessel MS-6805	.17		.40		145	
EOT0432	MS-6806 - Storage Vessel MS-6806	.17		.60		135	
EOT0433	MS-6807 - Storage Vessel MS-6807	.17		.60		135	
EOT0435	MS-6808 - Storage Vessel MS-6808	.17		.60		135	
EOT0436	MC-6810 - Process Equipment MC-6810	.17		.60		135	
EOT0437	MS-6709 - Storage Vessel MS-6709	.17		.25		145	
EOT0438	MS-6710 - Storage Vessel MS-6710	.17		.25		145	
EOT0439	NH - Variants "C" Reactor MR-4901	.99		.25		18	220
EOT0440	NO - Variants "A" Reactor MR-4816	1.42	193	.5		40	220
EOT0441	NP - Variants "B" Reactor MR-4840	8	24	.25		40	220
EOT0444	ZE - MDI 3 Caustic Scrubber AS-9304B	4.2	130.82	.81		103	108
EOT0445	MF-9217A - Storage Vessel MF-9217A			.25		26.5	140
EOT0446	MF-9217B - Storage Vessel MF-9217B			.25		42	150
EOT0447	MF-8245C - Storage Vessel MF-8245C			.25		42	150
EOT0448	MF-8245D - Storage Vessel MF-8245D			.25		42	150
EOT0449	ZI - MDI 2 Fume Scrubber AS-8303	17.73	1138	1.17		95.27	100
EOT0450	ZK - MDI 2 DADPM Tank MF-6101	1.32	3.88	.25		10	275
EOT0451	ZM - MDI 3 Truck Loading/Unloading	15.88	20.87	.17		10	100
EOT0452	ZN - MDI 3 Railcar Loading/Unloading	15.88	20.87	.17		20	100
EOT0453	ZO - Variants Reactor "F" MR-4842	.92	2.7	.25		50	220
EOT0454	ZP - Variants Product Storage Tank MF-4503M	1.31	3.85	.25		34	150
EOT0455	ZQ - Pure 2 Ml-30 Storage Tank MS-6716	1.03	3.04	.25		25	150
EOT0456	MS-9703 - Storage Vessel MS-9703			.25		20	150
EOT0457	MS-9708 - Storage Vessel MS-9708			.25		20	150
EOT0458	MS-9709 - Storage Vessel MS-9709			.25		20	150
EOT0459	MS-9710 - Storage Vessel MS-9710			.25		20	150
EOT0460	MC-9700 - Process Equipment MC-9700			.25		20	150
EOT0461	MS-9711 - Storage Vessel MS-9711			.25		20	150

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
MDI Plant:							
EQT0462	MS-9712 - Storage Vessel MS-9712			.25		20	150
EQT0463	ZT - Pure 3 Truck Loading/Unloading	1.82	2.39	.17		15	110
EQT0464	ZW - Variants CCP Product Storage Tank MF-4503N			.05		26	130
EQT0465	MC-4800 - Process Equipment MC-4800			.13		18	145
EQT0466	MS-4802A - Storage Vessel MS-4802A			.13		18	145
EQT0467	MS-4802B - Surge Control Vessel MS-4802B			.13		18	145
EQT0468	MS-4802C - Storage Vessel MS-4802C			.13		18	145
EQT0469	MM-6110 - Storage Vessel MM-6110			.25		6	140
EQT0470	MS-6115 - Aniline/Water Separator MS-6115			.25		6	140
EQT0471	MS-6118 - Storage Vessel MS-6118			.25		6	140
EQT0472	MS-6122 - Storage Vessel MS-6122			.25		6	140
EQT0473	MS-6158 - Storage Vessel MS-6158			.25		6	140
EQT0474	ZA - MDI 3 Fume Scrubber AS-9303	18.7	2000	1.17		95.25	100
EQT0476	MF-6302A - HCl Storage Tank - MF-6302A						
EQT0477	MF-6302B - HCl Storage Tank - MF-6302B						
EQT0478	MF-6302C - HCl Storage Tank - MF-6302C						
EQT0479	MS-4302B - HCl Storage Tank - MS-4302B						
EQT0480	MS-4302C - HCl Storage Tank - MS-4302C						
EQT0481	MS-4302D - HCl Storage Tank - MS-4302D						
EQT0482	MS-4302E - HCl Storage Tank - MS-4302E						
EQT0483	MS-4302F - HCl Storage Tank - MS-4302F						
EQT0484	MF-4302G - HCl Storage Tank - MF-4302G						
EQT0485	MF-9302A - HCl Storage Tank - MF-9302A						
EQT0486	MF-9302B - HCl Storage Tank - MF-9302B						
EQT0487	MS-4101A - Formalin Day Tank - MS-4101A						
EQT0488	MS-4101B - Formalin Day Tank - MS-4101B						
EQT0378	MR-6207 - PI Batch Reactor - MR-6207						
EQT0579	MR-4201 - MDI 1 Phosgenation Reactor Operation - MR-4201						
EQT0580	MR-4202 - MDI 1 Phosgenation Reactor Operation - MR-4202						
EQT0581	MR-4203 - MDI 1 Phosgenation Reactor Operation - MR-4203						
EQT0582	MR-4204 - MDI 1 Phosgenation Reactor Operation - MR-4204						
EQT0583	MR-6201 - MDI 2 Phosgenation Reactor Operation - MR-6201						
EQT0584	MR-6202 - MDI 2 Phosgenation Reactor Operation - MR-6202						
EQT0585	MR-6203 - MDI 2 Phosgenation Reactor Operation - MR-6203						

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
MDI Plant							
EQT0586	MR-6204 - MDI 2 Phosgenation Reactor Operation - MR-6204						
EQT0587	MR-4401A - Phosgene Reactor Operation - MR-4401A						
EQT0588	MR-4401B - Phosgene Reactor Operation - MR-4401B						
EQT0589	MR-4401C - Phosgene Reactor Operation - MR-4401C						
EQT0590	MR-4401D - Phosgene Reactor Operation - MR-4401D						
EQT0591	MR-4105A - MDI 1 DADPM Batch Operation - MR-4105A						
EQT0592	MR-4105B - MDI 1 DADPM Batch Operation - MR-4105B						
EQT0593	MR-4106 - MDI 1 Neutralizer - MR-4106						
EQT0594	MR-4210 - Fixed Prebed - Reactor 1A - MR-4210						
EQT0596	MR-6105A - MDI 2 DADPM Batch Operation - MR-6105A						
EQT0597	MR-6105B - MDI 2 DADPM Batch Operation - MR-6105B						
EQT0598	MR-6105C - MDI 2 DADPM Batch Operation - MR-6105C						
EQT0599	MR-6105D - MDI 2 DADPM Batch Operation - MR-6105D						
EQT0600	MR-6105E - MDI 2 DADPM Continuous Operation - MR-6105E						
EQT0601	MR-6105F - MDI 2 DADPM Continuous Operation - MR-6105F						
EQT0602	MR-6106 - Neutralizer - MR-6106						
EQT0603	MR-6103C - Neutralizer - MR-6103C						
EQT0604	MR-6107 - Neutralizer - MR-6107						
EQT0605	MR-9201 - MDI 3 Phosgenation Reactor Operation - MR-9201						
EQT0606	MR-9202 - MDI 3 Phosgenation Reactor Operation - MR-9202						
EQT0607	MR-9203 - MDI 3 Phosgenation Reactor Operation - MR-9203						
EQT0608	MR-9204 - MDI 3 Phosgenation Reactor Operation - MR-9204						
EQT0609	MR-9401A - Phosgene Reactor Operation - MR-9401A						
EQT0610	MR-9401B - Phosgene Reactor Operation - MR-9401B						
EQT0611	MR-9401C - Phosgene Reactor Operation - MR-9401C						
EQT0643	MR-4212 - Bed 2A						
EQT0644	MR-4213 - Bed 2B						
EQT0645	MR-4215 - Bed 4						
EQT0646	MR-4216 - SR						
EQT0654	MR-4211 - Bed 1B						
EQT0653	MR-4214 - Bed 3						
EQT0696	AS-6117 A - DADPM Continuous Isomerization Column						
EQT0697	AS-6117 B - DADPM Continuous Isomerization Column						
EQT0698	AS-6112 - CDU HCl Absorber Column						

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
MDI Plant							
EQT0899	MM-6122 - Neutralizer Separator Weir Box						
EQT0900	MR-6111 - MR-6111 - CDU Feed Drum						
EQT0901	MR-6124 - Neutralizer						
EQT0902	MS-6121 - Neutralizer Separator						
EQT0911	MS-4302A - HCl Day Tank - MS-4302A						
EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance						
GRP0044	KU - MDI 1 Cooling Towers GT-4501, GT-4528, and GT-4938	7.64		.33		36.09	110
RLP0034	KH - MDI 1 DADPM Tanks Vent	13.8		.25		10	275
RLP0035	KQ - MDI Bulk Tanks Common Vent 1	.89		.25		36	165
RLP0036	KV - MDI Bulk Tanks Common Vent 2	7.21		.25		26	160
RLP0037	MB - MDI 2 Test Tanks Vent	5.12		.25		26	140
RLP0038	MC - MDI Bulk Tanks Common Vent 3	3.11		.25		25	165
RLP0039	MD - Pure 2 MDI Day Tanks Vent	2		.25		25	150
RLP0040	MG - Variants Storage Common Vent 1	2.91		.13		26	160
RLP0041	MH - Variants Storage Common Vent 2	2.43		.13		26	140
RLP0042	MO - MDI Inventory Tanks Common Vent 1	6.75		.33		12	150
RLP0043	MY - Variants Product Storage Common Vent 1	2.95		.25		36	150
RLP0044	NB - Pure 2 Crystallizer Tanks Vent	9.16		.17		40	145
RLP0045	NC - Pure 2 Crystallizer Heat Transfer Tanks Vent	8.12		.17		60	135
RLP0046	ND - Pure 2 Distillate Hold and Test Tanks Vent	5.11		.17		25	145
RLP0047	ZF - MDI 3 Test Tanks Vent	5.12		.25		26.5	140
RLP0048	ZH - MDI 3 Inventory Tanks Vent	8.5		.25		42	150
RLP0049	ZR - Distillate & Product Storage Tanks Vent	5.57		.25		20	150
RLP0050	ZS - Pure MDI/M-20 Storage Tank Vent	2.48		.25		20	150
RLP0051	KI - Pure 1 Distillate Vent	14.4		.13		18	145
RLP0052	ZL - DADPM 2 Storage Vessel and Separation Weir Vent	.01		.25		6	140

Relationships:

ID	Description	Relationship	ID	Description
EQT0371	MS-4217A - Storage Vessel	Vents to	RLP0032	KD - MDI Test Tanks Vent
EQT0372	MS-4217B - Storage Vessel	Vents to	RLP0032	KD - MDI Test Tanks Vent
EQT0373	MS-4217C - Storage Vessel	Vents to	RLP0032	KD - MDI Test Tanks Vent
EQT0374	MS-4906 - Storage Vessel	Vents to	RLP0032	KD - MDI Test Tanks Vent
EQT0375	MF-4118 - Storage Vessel	Vents to	RLP0033	KF - MDI 1 Aniline Storage Vent Seal Pot MMK1A

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Relationships:

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EQT0376	MM-4110 - Aniline/Water Separator Weir Box	Vents to	RLP0033	KF - MDI 1 Aniline Storage Venti Seal Pot MMK1A
EQT0377	MS-4115 - Aniline/Water Separator	Vents to	RLP0033	KF - MDI 1 Aniline Storage Venti Seal Pot MMK1A
EQT0378	MS-4118 - Wash Water Feed	Vents to	RLP0033	KF - MDI 1 Aniline Storage Venti Seal Pot MMK1A
EQT0379	MS-4121 - Wei Aniline Storage	Vents to	RLP0033	KF - MDI 1 Aniline Storage Venti Seal Pot MMK1A
EQT0380	MS-4122 - DADPM Stripper Overhead Seal Pot Tank	Vents to	RLP0033	KF - MDI 1 Aniline Storage Venti Seal Pot MMK1A
EQT0381	MS-4158 - Amine Water Pump Out Pot	Vents to	RLP0033	KF - MDI 1 Aniline Storage Venti Seal Pot MMK1A
EQT0383	MF-4223 - Storage Vessel	Vents to	RLP0034	KH - MDI 1 DADPM Tanks Vent
EQT0384	MF-4112A - Storage Vessel	Vents to	RLP0034	KH - MDI 1 DADPM Tanks Vent
EQT0385	MF-4112B - Storage Vessel	Vents to	RLP0034	KH - MDI 1 DADPM Tanks Vent
EQT0386	MF-4112C - Storage Vessel	Vents to	RLP0034	KH - MDI 1 DADPM Tanks Vent
EQT0387	MF-4112D - Storage Vessel	Vents to	RLP0034	KH - MDI 1 DADPM Tanks Vent
EQT0390	MS-4503A - Storage Vessel	Vents to	RLP0035	KO - MDI Bulk Tank Common Vent 1
EQT0391	MS-4503B - Storage Vessel	Vents to	RLP0035	KO - MDI Bulk Tank Common Vent 1
EQT0396	MF-4503C - Storage Vessel	Vents to	RLP0036	KV - MDI Bulk Tanks Common Vent 2
EQT0397	MF-4503D - Storage Vessel	Vents to	RLP0036	KV - MDI Bulk Tanks Common Vent 2
EQT0398	MF-4503E - Storage Vessel	Vents to	RLP0036	KV - MDI Bulk Tanks Common Vent 2
EQT0401	MF-6217A - Storage Vessel	Vents to	RLP0037	MB - MDI 2 Test Tanks Vent
EQT0402	MF-6217B - Storage Vessel	Vents to	RLP0037	MB - MDI 2 Test Tanks Vent
EQT0403	MF-4503H - Storage Vessel	Vents to	RLP0038	MC - MDI Bulk Tanks Common Vent 3
EQT0404	MF-4503I - Storage Vessel	Vents to	RLP0038	MC - MDI Bulk Tanks Common Vent 3
EQT0405	MF-6701A - Storage Vessel	Vents to	RLP0039	MD - Pure 2 MDI Day Tanks Vent
EQT0406	MF-6701B - Storage Vessel	Vents to	RLP0039	MD - Pure 2 MDI Day Tanks Vent
EQT0407	MF-6703A - Pure II Mixed Isomer Day Storage	Vents to	RLP0039	MD - Pure 2 MDI Day Tanks Vent
EQT0408	MS-4917 - Storage Vessel	Vents to	RLP0040	MG - Variants Storage Common Vent 1
EQT0409	MS-4918 - Storage Vessel	Vents to	RLP0040	MG - Variants Storage Common Vent 1
EQT0410	MS-4919 - Storage Vessel	Vents to	RLP0040	MG - Variants Storage Common Vent 1
EQT0411	MF-4517 - Storage Vessel	Vents to	RLP0041	MH - Variants Storage Common Vent 2
EQT0412	MF-4518 - Storage Vessel	Vents to	RLP0041	MH - Variants Storage Common Vent 2
EQT0418	MF-8245A - Storage Vessel	Vents to	RLP0042	MO - MDI Inventory Tanks Common Vent 1
EQT0419	MF-8245B - Storage Vessel	Vents to	RLP0042	MO - MDI Inventory Tanks Common Vent 1
EQT0425	MF-4503K - Storage Vessel	Vents to	RLP0043	MY - Variants Product Storage Common Vent 1
EQT0426	MF-4503L - Storage Vessel	Vents to	RLP0043	MY - Variants Product Storage Common Vent 1
EQT0427	MS-6801 - Storage Vessel	Vents to	RLP0044	NB - Pure 2 Crystallizer Tanks Vent
EQT0428	MS-6802 - Storage Vessel	Vents to	RLP0044	NB - Pure 2 Crystallizer Tanks Vent
EQT0429	MS-6803 - Storage Vessel	Vents to	RLP0044	NB - Pure 2 Crystallizer Tanks Vent
EQT0430	MS-6804 - Storage Vessel	Vents to	RLP0044	NB - Pure 2 Crystallizer Tanks Vent
EQT0431	MS-6805 - Storage Vessel	Vents to	RLP0044	NB - Pure 2 Crystallizer Tanks Vent

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Relationships:

ID	Description	Vents to	Relationship	ID	Description
EQT0433	MS-61806 - Storage Vessel	Vents to		RLP0045	NC - Pure 2 Crystallizer Heat Transfer Tanks Vent
EQT0434	MS-61807 - Storage Vessel	Vents to		RLP0045	NC - Pure 2 Crystallizer Heat Transfer Tanks Vent
EQT0435	MS-61808 - Storage Vessel	Vents to		RLP0045	NC - Pure 2 Crystallizer Heat Transfer Tanks Vent
EQT0436	MC-61810 - Process Equipment	Vents to		RLP0044	NB - Pure 2 Crystallizer Tanks Vent
EQT0437	MS-61709 - Storage Vessel	Vents to		RLP0046	ND - Pure 2 Distillate Hold and Test Tanks Vent
EQT0438	MS-61710 - Storage Vessel	Vents to		RLP0046	ND - Pure 2 Distillate Hold and Test Tanks Vent
EQT0445	MF-9217A - Storage Vessel	Vents to		ZF - MDI 3 Test Tanks Vent	ZF - MDI 3 Test Tanks Vent
EQT0446	MF-9217B - Storage Vessel	Vents to		ZF - MDI 3 Test Tanks Vent	ZF - MDI 3 Test Tanks Vent
EQT0447	MF-8245C - Storage Vessel	Vents to		ZH - MDI 3 Inventory Tanks Vent	ZH - MDI 3 Inventory Tanks Vent
EQT0448	MF-8245D - Storage Vessel	Vents to		ZL - MDI 3 Inventory Tanks Vent	ZL - MDI 3 Inventory Tanks Vent
EQT0456	MS-9703 - Storage Vessel	Vents to		ZR - Distillate & Product Storage Tanks Vent	ZR - Distillate & Product Storage Tanks Vent
EQT0457	MS-9708 - Storage Vessel	Vents to		ZR - Distillate & Product Storage Tanks Vent	ZR - Distillate & Product Storage Tanks Vent
EQT0458	MS-9709 - Storage Vessel	Vents to		ZR - Distillate & Product Storage Tanks Vent	ZR - Distillate & Product Storage Tanks Vent
EQT0459	MS-9710 - Storage Vessel	Vents to		ZR - Distillate & Product Storage Tanks Vent	ZR - Distillate & Product Storage Tanks Vent
EQT0460	MC-9700 - Process Equipment	Vents to		ZR - Distillate & Product Storage Tanks Vent	ZR - Distillate & Product Storage Tanks Vent
EQT0461	MS-9711 - Storage Vessel	Vents to		ZS - Pure MDIMI-20 Storage Tank Vent	ZS - Pure MDIMI-20 Storage Tank Vent
EQT0462	MS-9712 - Storage Vessel	Vents to		ZS - Pure MDIMI-20 Storage Tank Vent	ZS - Pure MDIMI-20 Storage Tank Vent
EQT0465	MC-4800 - Process Equipment	Vents to		KI - Pure 1 Distillate Vent	KI - Pure 1 Distillate Vent
EQT0466	MS-4802A - Storage Vessel	Vents to		KI - Pure 1 Distillate Vent	KI - Pure 1 Distillate Vent
EQT0467	MS-4802B - Surge Control Vessel	Vents to		KI - Pure 1 Distillate Vent	KI - Pure 1 Distillate Vent
EQT0468	MS-4802C - Storage Vessel	Vents to		KI - Pure 1 Distillate Vent	KI - Pure 1 Distillate Vent
EQT0469	MM-6110 - Storage Vessel	Vents to		ZL - DADPM 2 Storage Vessel and Separation Weir Vent	ZL - DADPM 2 Storage Vessel and Separation Weir Vent
EQT0470	MS-6115 - Aniline/Water Separator	Vents to		ZL - DADPM 2 Storage Vessel and Separation Weir Vent	ZL - DADPM 2 Storage Vessel and Separation Weir Vent
EQT0471	MS-6118 - Storage Vessel	Vents to		ZL - DADPM 2 Storage Vessel and Separation Weir Vent	ZL - DADPM 2 Storage Vessel and Separation Weir Vent
EQT0472	MS-6122 - Storage Vessel	Vents to		ZL - DADPM 2 Storage Vessel and Separation Weir Vent	ZL - DADPM 2 Storage Vessel and Separation Weir Vent
EQT0473	MS-6158 - Storage Vessel	Vents to		ZL - DADPM 2 Storage Vessel and Separation Weir Vent	ZL - DADPM 2 Storage Vessel and Separation Weir Vent
EQT0476	MF-6302A - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0477	MF-6302B - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0478	MF-6302C - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0479	MS-4302B - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0480	MS-4302C - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0481	MS-4302D - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0482	MS-4302E - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0483	MF-4302F - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0484	MF-4302G - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0485	MF-9302A - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA
EQT0486	MF-9302B - HCl Storage Tank	Vents to		GRP0042	Fume Scrubber Emissions KB, ZL, ZA

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Relationships:

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EQT0487	MS-4101A - Formalin Day Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0488	MS-4101B - Formalin Day Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0497	MF-4302A - HCl Day Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0513	MS-4304 - HCl Run Down	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0514	GU-4103 - Graesser	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0515	GU-6103 - Graesser	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0516	MF-4108 - Unwashed DADPM Hold	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0517	MF-6108 - Unwashed DADPM Hold	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0518	MS-4212 - Concentrated Crude Storage	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0521	MS-6701 - Precursor Feed Pot	Vents to	RLP0037	MB - MDI 2 Test Tanks Vent
EQT0522	MS-9701 - Precursor Feed Pot	Vents to	RLP0047	ZF - MDI 3 Test Tanks Vent
EQT0527	MS-4107 - Amine Brine Receiver	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0528	MS-6107 - Amine Brine Receiver	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0529	MS-6107B - Amine Brine Receiver	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0530	MF-4209A - MCB Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0531	MF-4209B - MCB Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0532	MF-6209A - MCB Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0533	MF-6209B - MCB Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0534	MF-9209A - MCB Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0535	MF-9209B - MCB Storage	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0538	MM-4104 - Graesser Washer Weir Pot	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0539	MM-6104 - Graesser Washer Weir Pot	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0540	MM-4105 - Extractor Weir Pot	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0541	MM-6105 - Extractor Weir Pot	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0548	MS-4109 - DADPM Buffer	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0549	MS-6109 - DADPM Buffer	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0550	MS-4110 - Decanter	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0551	MS-6110 - Decanter	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0554	MS-6212 - Conc. Crude Storage	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0555	MS-9212 - Conc. Crude Storage	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0556	MS-4162 - Reflux	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0557	MS-6162 - Reflux	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0570	MS-4404 - Phosgene Absorber Emergency Storage	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0571	MS-63310 - Phosgene Absorber Emergency Storage	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0572	MS-93310 - Phosgene Absorber Emergency Storage	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0573	MS-4403 - Phosgene Level Pot	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0579	MR-4201 - MDI 1 Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE

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Relationships:

ID	Description	Relationship	ID	Description
EQT0580	MR-4202 - MDI 1 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0581	MR-4203 - MDI 1 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0582	MR-4204 - MDI 1 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0583	MR-6201 - MDI 2 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0584	MR-6202 - MDI 2 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0585	MR-6203 - MDI 2 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0586	MR-6204 - MDI 2 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0587	MR-4401A - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0588	MR-4401B - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0589	MR-4401C - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0590	MR-4401D - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0591	MR-4105A - MDI 1 DADPM Batch Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0592	MR-4105B - MDI 1 DADPM Batch Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0593	MR-4106 - MDI 1 Neutralizer	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0594	MR-4210 - Fixed Pnebed - Reactor-1A - MR-4210	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0596	MR-6105A - MDI 2 DADPM Batch Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0597	MR-6105B - MDI 2 DADPM Batch Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0598	MR-6105C - MDI 2 DADPM Batch Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0599	MR-6105D - MDI 2 DADPM Batch Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0800	MR-6105E - MDI 2 DADPM Continuous Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0801	MR-6105F - MDI 2 DADPM Continuous Operation	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0802	MR-6106 - Neutralizer	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0803	MR-6103C - Neutralizer	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0804	MR-6107 - Neutralizer	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0605	MR-9201 - MDI 3 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0606	MR-9202 - MDI 3 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0607	MR-9203 - MDI 3 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0608	MR-9204 - MDI 3 Phosgenation Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0609	MR-9401A - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0610	MR-9401B - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0611	MR-9401C - Phosgene Reactor Operation	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0612	AS-4101 - DADPM Stripper Distillation Column	Vents to	EQT0380	MS-4122 - DADPM Stripper Overhead Seal Pot Tank
EQT0613	AS-4103 - Amine Brine Stripper	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0614	AS-4104 - Methanol Fractionator	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0615	AS-4800 - Pure 1 Splitting Distillation Column	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0616	AS-6701 - Pure 2 Splitting Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0617	AS-6205 - PI Stripper Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE

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Relationships:

ID	Description	Relationship	ID	Description
EQT0618	AS-6202 - MDI Purification Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0619	AS-6203 - MDI Purification Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0620	AS-6201 - MDI 2 MCB Recovery Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0621	MS-6210 - MDI 2 MCB Recovery Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0622	AS-6301 - MDI 2 Phosgene Absorber Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0623	AS-4201 - MDI 1 MCB Recovery Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0624	MS-4210 - MDI 1 MCB Recovery Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0625	AS-4301 - MDI 1 Phosgene Absorber Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0626	AS-4202 - MDI 1 Purification Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0627	AS-4203 - MDI 1 Phosgene Absorber Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0628	AS-6101 - DADPM 2 DADPM Sniffer Distillation Column	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0629	AS-6103 - Effluent Recovery Distillation Column	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0630	AS-6104 - Effluent Recovery Distillation Column	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0632	AS-9201 - MDI 3 MCB Recovery Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0633	MS-9210 - MDI 3 MCB Recovery Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0634	AS-9301 - MDI 3 Phosgene Absorber Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0635	AS-9202 - MDI 3 MDI Purification Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0636	AS-9203 - MDI 3 MDI Purification Distillation Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0637	AS-9702 - Pure 3 Lights Removal Column	Vents to	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0643	MR-4212 - Bed 2A	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0644	MR-4213 - Bed 2B	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0645	MR-4215 - Bed 4	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0646	MR-4216 - SR	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0652	GU-4104 - Effluent Extractor	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0653	GU-6104 - Effluent Extractor	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0654	MR-4211 - Bed 1B	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0833	MR-4214 - Bed 3	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0868	TT-4129 - Methanol Fractionator Vent Condenser	Controlled by	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0871	TT-4402 - Phosgene Vent Condenser	Controlled by	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0872	TT-4233 - Vacuum Pump Separator Condenser	Controlled by	GRP0041	Caustic Scrubbers KC, MA, and ZE
EQT0873	TT-6123 - DADPM Plant Vent Condenser	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0874	TT-6129 - Methanol Fractionator Vent Condenser	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0896	AS-6117 A - DADPM Continuous Isomerization Column	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0897	AS-6117 B - DADPM Continuous Isomerization Column	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0898	AS-6112 - CDDU HCl Absorber Column	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0899	MM-6122 - Neutralizer Separator Weir Box	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0900	MR-6111 - CDDU Feed Drum	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA

INVENTORIES

All ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT0901	MR-6124 - Neutralizer	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0902	MS-6121 - Neutralizer Separator	Controlled by	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT0911	MS-4302A - HCl Day Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT1194	MF-571A - HCl Storage Tank MF-571A	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1195	MF-572A - HCl Storage Tank MF-572A	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1196	MF-573A - HCl Storage Tank MF-573A	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1197	Loading - HCl Tank Truck Loading	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1198	MF-571B - HCl Storage Tank MF-571B	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1199	MF-572B - HCl Storage Tank MF-572B	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1200	MF-573B - HCl Storage Tank MF-573B	Vents to	EQT1193	IQ - HCl Scrubber AS-5401 and Maintenance
EQT1201	MF-571A - HCl Storage Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT1202	MF-571B - HCl Storage Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT1203	MF-572A - HCl Storage Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT1204	MF-572B - HCl Storage Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT1205	MF-573A - HCl Storage Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA
EQT1206	MF-573B - HCl Storage Tank	Vents to	GRP0042	Fume Scrubber Emissions KB, ZI, ZA

Subject Item Groups:

ID	Group Type	Group Description
CRG0020	Common Requirements Group	CRG020 - MDI 1, MDI 2, and MDI 3 Cooling Towers
CRG0021	Common Requirements Group	CRG021 - MDI 2 DADPM Batch Operation - Reactors MR-6105A, B, C, D, MR-6107, and MR-6108
CRG0023	Common Requirements Group	CRG023 - AS-4101, AS-4103, and AS-4104
CRG0024	Common Requirements Group	CRG024 - Coolers and Condensers
CRG0025	Common Requirements Group	CRG025 - TT-4401 and TT-401
CRG0027	Common Requirements Group	CRG027 - MS-4115, 6115, 4156, 6121, 6156, and 4251
CRG0028	Common Requirements Group	CRG028 - EQT 791 - EQT 798
CRG0029	Common Requirements Group	CRG029 - Phosgene Reactor Operation MR-9401 A/B/C
CRG0030	Common Requirements Group	CRG030 - HCl Storage Tanks and HCl Loading
GRP0041	Equipment Group	MDI Cap 1 - Caustic Scrubbers KC, MA, and ZE
GRP0042	Equipment Group	MDI Cap 2 - Fume Scrubber Emissions
GRP0044	Equipment Group	KU - MDI 1 Cooling Towers GT-4501, GT-4528, and GT-4838
UNF0006	Unit or Facility Wide	Plant - MDI

Group Membership:

ID	Description	Member of Groups
EQT0369	KB - MDI 1 Fume Scrubber AS-4303A/B	GRP00000000042
EQT0370	KC - MDI 1 Caustic Scrubber AS-4304B	GRP00000000041
EQT0377	MS-4115 - Amiline/Water Separator MS-4115	CRG00000000027

INVENTORIES

AID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-Y09
Air - Title V Regular Permit Renewal

Group Membership:

Group Membership:	ID	Description	Member of Groups
	EQT0353	GT-4501 - Cooling Tower GT-4501	CRG00000000020, GRP00000000044
	EQT0394	GT-4528 - Cooling Tower GT-4528	CRG00000000020, GRP00000000044
	EQT0395	GT-4938 - Cooling Tower GT-4938	CRG00000000020, GRP00000000044
	EOT0400	MA - MDI 2 Caustic Scrubber AS-6304B	GRP00000000041
	EOT0422	MU - MDI 2 Cooling Tower GT-6501	CRG00000000020
	EOT0442	OE - Nitric Acid Cooling Tower GT-1454	CRG00000000020
	EOT0443	ZB - MDI 3 Cooling Tower GT-8310	CRG00000000020
	EOT0444	ZE - MDI 3 Caustic Scrubber AS-9304B	GRP00000000041
	EOT0445	ZI - MDI 2 Fume Scrubber AS-6303	GRP00000000042
	EOT0470	MS-6115 - Aniline/Water Separator MS-6115	CRG00000000027
	EOT0474	ZA - MDI 3 Fume Scrubber AS-9303	GRP00000000042
	EOT0594	MR-4210 - Fixed Bed Reactor 1A - MR-4210	CRG00000000022
	EOT0596	MR-6105A - MDI 2 DADPM Batch Operation - MR-6105A	CRG00000000021
	EOT0597	MR-6105B - MDI 2 DADPM Batch Operation - MR-6105B	CRG00000000021
	EOT0598	MR-6105C - MDI 2 DADPM Batch Operation - MR-6105C	CRG00000000021
	EOT0599	MR-6105D - MDI 2 DADPM Batch Operation - MR-6105D	CRG00000000021
	EOT0602	MR-6106 - Neutralizer - MR-6106	CRG00000000021
	EOT0604	MR-6107 - Neutralizer - MR-6107	CRG00000000021
	EOT0609	MR-9401A - Phosgene Reactor Operation - MR-9401A	CRG00000000029
	EOT0610	MR-9401B - Phosgene Reactor Operation - MR-9401B	CRG00000000029
	EOT0611	MR-9401C - Phosgene Reactor Operation - MR-9401C	CRG00000000023
	EOT0612	AS-4101 - DADPM Stripper Distillation Column - AS-4101	CRG00000000023
	EOT0613	AS-4103 - Amine Brine Stripper - AS-4103	CRG00000000023
	EOT0614	AS-4104 - Methylene Fractionator - AS-4104	CRG00000000023
	EOT0643	MR-4212 - Bed 2A	CRG00000000022
	EOT0644	MR-4213 - Bed 2B	CRG00000000022
	EOT0645	MR-4215 - Bed 4	CRG00000000022
	EOT0646	MR-4216 - SR	CRG00000000022
	EOT0654	MR-4211 - Bed 1B	CRG00000000022
	EOT0703	TT-9318 - HCl Clean-up Column Condenser - TT-9318	CRG00000000024
	EOT0762	TT-4128 - MeOH Bottoms Cooler - TT-4128	CRG00000000024
	EOT0763	TT-6128 - MeOH Bottoms Cooler - TT-6128	CRG00000000024
	EOT0764	TT-6102A - DADPM Reactor Vent Condenser - TT-6102A	CRG00000000024
	EOT0765	TT-6102B - DADPM Reactor Vent Condenser - TT-6102B	CRG00000000024
	EOT0766	TT-6102C - DADPM Reactor Vent Condenser - TT-6102C	CRG00000000024
	EOT0767	TT-6102D - DADPM Reactor Vent Condenser - TT-6102D	CRG00000000024
	EOT0768	TT-6102E - DADPM Reactor Vent Condenser - TT-6102E	CRG00000000024
	EOT0769	TT-6102F - DADPM Reactor Vent Condenser - TT-6102F	CRG00000000024
	EOT0776	TT-4207 - MCB Cooler - TT-4207	CRG00000000024
	EOT0777	TT-6207 - MCB Cooler - TT-6207	CRG00000000024
	EOT0778	TT-9207 - MCB Cooler - TT-9207	CRG00000000024
	EOT0779	TT-9704 - MCB Cooler - TT-9704	CRG00000000024
	EOT0780	TT-9260 - Recovery Column Off Gas Condenser - TT-9260	CRG00000000024

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

Group Membership:

Group Membership:	ID	Description	Member of Groups
	EQT0781	TT-9315A - HCl Compressor 1st Intercooler - TT-9315A	CRG00000000024
	EQT0782	TT-9315B - HCl Compressor 2nd Intercooler - TT-9315B	CRG00000000024
	EQT0783	TT-9316 - HCl Compressor Aftercooler - TT-9316	CRG00000000024
	EQT0791	TT-4101A - DADPM Reactor Cooler - TT-4101A	CRG00000000024, CRG00000000028
	EQT0792	TT-4101B - DADPM Reactor Cooler - TT-4101B	CRG00000000024, CRG00000000028
	EQT0793	TT-6101A - DADPM Reactor Cooler - TT-6101A	CRG00000000024, CRG00000000028
	EQT0794	TT-6101B - DADPM Reactor Cooler - TT-6101B	CRG00000000024, CRG00000000028
	EQT0795	TT-6101C - DADPM Reactor Cooler - TT-6101C	CRG00000000024, CRG00000000028
	EQT0796	TT-6101D - DADPM Reactor Cooler - TT-6101D	CRG00000000024, CRG00000000028
	EQT0797	TT-6101E - DADPM Reactor Cooler - TT-6101E	CRG00000000024, CRG00000000028
	EQT0798	TT-6101F - DADPM Reactor Cooler - TT-6101F	CRG00000000024, CRG00000000028
	EQT0799	TT-4401 - Phosgene Reactor Condenser - TT-4401	CRG00000000024, CRG00000000025
	EQT0800	TT-9401 - Phosgene Reactor Condenser - TT-9401	CRG00000000024, CRG00000000025
	EQT0833	MR-4214 - Bed 3	CRG00000000022
	EQT0864	MS-4156 - Amine Water/Amine Separator - MS-4156	CRG00000000027
	EQT0865	MS-6156 - Amine Water/Amine Separator - MS-6156	CRG00000000027
	EQT0903	TT-6116A - CDU Cooler	CRG00000000024
	EQT0904	TT-6116B - CDU Cooler	CRG00000000024
	EQT0905	TT-6116C - CDU Cooler	CRG00000000024
	EQT0906	TT-6116D - CDU Cooler	CRG00000000024
	EQT1197	Loading - HCl Tank Truck Loading	CRG00000000030
	EQT1198	MF-571B - HCl Storage Tank MF-571B	CRG00000000030
	EQT1199	MF-572B - HCl Storage Tank MF-572B	CRG00000000030
	EQT1200	MF-573B - HCl Storage Tank MF-573B	CRG00000000030
	EQT1201	MF-577A - HCl Storage Tank	CRG00000000030
	EQT1202	MF-577B - HCl Storage Tank	CRG00000000030
	EQT1203	MF-572A - HCl Storage Tank	CRG00000000030
	EQT1204	MF-572B - HCl Storage Tank	CRG00000000030
	EQT1205	MF-573A - HCl Storage Tank	CRG00000000030
	EQT1206	MF-573B - HCl Storage Tank	CRG00000000030

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multipplier	Units Of Measure
0610	Syrene Monomer (Rated Capacity)	1631	MM lb/Yr

SIC Codes:	Cyclic organic crudes, intermediates, dyes and pigments	UNF006
2865		

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Subject Item	CO			PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
MD1 Plant									
EQT 0369 K8							7.95		
EQT 0370 KC		7050				25.55	33.19	116.28	
EQT 0388 KJ					<0.001		<0.001		
EQT 0389 KK					<0.001		<0.001		
EQT 0392 KT					<0.001	<0.001	0.002		
EQT 0399 K2					<0.001		<0.001		
EQT 0400 MA		7050				15.48	19.44	13.56	
EQT 0413 MH-1					<0.001		<0.001		
EQT 0414 MH-2					<0.001	<0.001	<0.001		
EQT 0415 MK						<0.001		<0.001	
EQT 0416 MM						<0.001		<0.001	
EQT 0417 MN						<0.001		<0.001	
EQT 0420 MQ						0.002	0.003	0.01	
EQT 0421 MR						<0.001	<0.001	0.002	
EQT 0422 WJ		0.41				1.81			
EQT 0423 MW						<0.001	<0.001	<0.001	
EQT 0424 MX						<0.001		<0.001	
EQT 0439 NN						<0.001	<0.001	<0.001	
EQT 0440 NO						<0.001	<0.001	<0.001	
EQT 0441 NP						<0.001	<0.001	<0.001	
EQT 0442 OE		0.11				0.46			
EQT 0443 ZB		1.73				7.60			
EQT 0444 ZE		1800				21.17	26.46	18.55	

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Subject Item	CO			PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
MDI Plant									
EQT 0449 ZJ							0.001		0.004
EQT 0450 ZK							0.002	0.003	0.01
EQT 0451 ZM							<0.001	<0.001	0.003
EQT 0452 ZN							<0.001	<0.001	<0.001
EQT 0453 ZO							<0.001	<0.001	<0.001
EQT 0454 ZP							<0.001	<0.001	<0.001
EQT 0455 ZA							<0.001	<0.001	<0.001
EQT 0463 ZT							<0.001	<0.001	<0.001
EQT 0464 ZW							<0.001	<0.001	<0.001
EQT 0474 ZA								7.70	
EQT 0475 ZV							10.25	34.75	0.93
FUG 0020 KS							1.65		7.24
FUG 0021 ZU							1.23		5.37
GRP 0041 MDI Cap 1	186.37	816.38							
GRP 0042 MDI Cap 2							6.02		26.36
GRP 0044 KU				0.19	0.24	0.85			
RLP 0032 KD							<0.001		<0.001
RLP 0033 KF							0.12		0.51
RLP 0034 KH							0.003		0.01
RLP 0035 KA							<0.001		<0.001
RLP 0036 KV							<0.001		<0.001
RLP 0037 MB							<0.001		<0.001
RLP 0038 MC							<0.001		<0.001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-Y09
Air - Title V Regular Permit Renewal

Subject Item	CO			PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lbs/hr	Max lbs/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
MDI Plant									
RLP 0039 kg							<0.001		<0.001
RLP 0040 MG							<0.001		<0.001
RLP 0041 NH							<0.001		<0.001
RLP 0042 MO							<0.001		<0.001
RLP 0043 NV							<0.001		<0.001
RLP 0044 NB							<0.001		<0.001
RLP 0045 NC							0.35	0.44	1.55
RLP 0046 ND							<0.001		<0.001
RLP 0047 ZF							<0.001		<0.001
RLP 0048 ZH							<0.001		<0.001
RLP 0049 ZR							<0.001	<0.001	<0.001
RLP 0050 ZS							<0.001		<0.001
RLP 0051 NI							<0.001		<0.001
RLP 0052 ZL							<0.001	<0.001	<0.001

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0369 KB	Ammonia		0.34	
	Aniline		0.88	
	Carbon tetrachloride		0.41	
	Chlorobenzene		5.99	
	Chloroform		0.05	
	Dichloromethane		0.05	
	Formaldehyde		0.19	
	Hydrochloric acid		1.45	
	Methanol		0.44	
EQT 0370 KC	Carbon tetrachloride	4.61	5.76	20.18
	Chlorobenzene	21.88	27.34	95.81
	Chloroform	0.07	0.08	0.29
	Dichloromethane	0.01	0.01	0.04
	Hydrochloric acid	< 0.001	< 0.001	0.001
	Phosgene	0.001	0.001	0.003
EQT 0382 KG	Ammonia	0.05	0.06	0.20
EQT 0388 KJ	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0389 KK	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0392 KT	4,4'-Methylenebisbenzeneamine	< 0.001	< 0.001	0.002
EQT 0399 KZ	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0400 MA	Carbon tetrachloride	0.89	1.20	0.78
	Chlorobenzene	14.58	18.22	12.77
	Chloroform	0.02	0.02	0.01
	Dichloromethane	0.004	0.01	0.004
	Hydrochloric acid	< 0.001	< 0.001	< 0.001
	Phosgene	< 0.001	< 0.001	< 0.001
EQT 0413 MH-1	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0414 MH-2	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EQT 0415 MK	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0416 MM	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0417 MN	Methylene diphenyl diisocyanate	< 0.001		< 0.001
EQT 0420 MQ	Methylene diphenyl diisocyanate	0.002	0.003	0.01
EQT 0421 MR	Methylene diphenyl diisocyanate	< 0.001	< 0.001	0.002
EQT 0422 MU	Chlorine	< 0.001		< 0.001

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EOT 0423 MW	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0424 MX	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0439 NN	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0440 NO	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0441 NP	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0442 OE	Chlorine	< 0.001		< 0.001
EOT 0443 ZB	Chlorine	< 0.001	< 0.001	< 0.001
EOT 0444 ZE	Carbon tetrachloride	3.87	4.83	3.39
	Chlorobenzene	17.24	21.56	15.11
	Chloroform	0.06	0.07	0.05
	Dichloromethane	0.001	0.002	0.001
	Hydrochloric acid	< 0.001	< 0.001	< 0.001
	Phosgene	< 0.001	< 0.001	< 0.001
EOT 0449 ZI	Ammonia		0.34	
	Aniline		0.88	
	Carbon tetrachloride		0.41	
	Chlorobenzene		5.99	
	Chloroform		0.05	
	Dichloromethane		0.05	
	Formaldehyde		0.10	
	Hydrochloric acid		1.45	
EOT 0450 ZK	Methanol		0.28	
	4,4'-Methylenebisbenzeneamine	0.001		0.004
EOT 0451 ZM	Methylene diphenyl diisocyanate	0.002	0.003	0.01
EOT 0452 ZN	Methylene diphenyl diisocyanate	< 0.001	< 0.001	0.003
EOT 0453 ZO	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0454 ZP	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0455 ZQ	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0463 ZT	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0464 ZW	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
EOT 0474 ZA	Ammonia		0.34	
	Aniline		0.88	
	Carbon tetrachloride		0.41	
	Chlorobenzene		5.99	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0474 ZA	Chloroform		0.05	
	Dichloromethane		0.05	
	Formaldehyde		0.10	
	Hydrochloric acid		1.45	
	Methanol		0.28	
EQT 0475 ZV	Chlorobenzene	10.25	34.75	0.93
EQT 1193 IQ	Hydrochloric acid	0.03	1.20	0.15
FUG 0020 KS	4,4'-Methylenebisbenzeneamine	0.38		1.65
	Ammonia	< 0.001		< 0.001
	Aniline	0.10		0.43
	Benzene	< 0.001		< 0.001
	Carbon tetrachloride	< 0.001		< 0.001
	Chlorobenzene	0.51		2.25
	Formaldehyde	0.02		0.10
	Methanol	0.02		0.10
	Methylene diphenyl diisocyanate	0.57		2.51
	Phenol	< 0.001		< 0.001
FUG 0021 ZU	Phosgene	0.05		0.20
	Ammonia	0.06		0.26
	Aniline	0.05		0.24
	Carbon tetrachloride	0.10		0.44
	Chlorobenzene	0.98		4.29
GRP 0042 MDI Cap 2	Methanol	0.09		0.41
	Ammonia	0.27		1.19
	Aniline	0.70		3.07
	Carbon tetrachloride	0.29		1.28
	Chlorobenzene	4.48		19.64
	Chloroform	0.04		0.18
	Dichloromethane	0.04		0.18
	Formaldehyde	0.15		0.67
	Hydrochloric acid	1.16		5.09
GRP 0044 KU	Methanol	0.35		1.52
	Chlorine	< 0.001	< 0.001	< 0.001
RPL 0032 KD	Methylene diphenyl diisocyanate	< 0.001		< 0.001

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
RLP 0033 KF	4,4'-Methylenebisbenzeneamine	< 0.001		< 0.001
	Aniline	0.12		0.51
	Methanol	< 0.001		< 0.001
RLP 0034 KH	4,4'-Methylenebisbenzeneamine	0.003		0.01
RLP 0035 KG	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0036 KV	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0037 MB	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0038 MC	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0039 MD	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0040 MC	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0041 MH	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0042 MO	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0043 MY	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0044 NB	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0045 NC	Ethylene glycol	0.35	0.44	1.55
RLP 0046 ND	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0047 ZF	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0048 ZH	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0049 ZR	Methylene diphenyl diisocyanate	< 0.001	< 0.001	< 0.001
RLP 0050 ZS	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0051 KI	Methylene diphenyl diisocyanate	< 0.001		< 0.001
RLP 0052 ZL	4,4'-Methylenebisbenzeneamine	< 0.001	< 0.001	< 0.001
	Aniline	< 0.001	< 0.001	< 0.001
	Methanol	< 0.001	< 0.001	< 0.001
UNF 0006 Plant	4,4'-Methylenebisbenzeneamine			1.67
	Ammonia			1.65
	Aniline			4.25
	Benzene			< 0.001
	Carbon tetrachloride			26.07
	Chlorine			< 0.001
	Chlorobenzene			150.80
	Chloroform			0.53
	Dichloromethane			0.23
	Ethylene glycol			1.55

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0006 Plant	Formaldehyde			0.77
	Hydrochloric acid			5.24
	Methanol			2.03
	Methylene diphenyl diisocyanate			2.53
	Phenol			< 0.001
	Phosgene			0.20

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

CRG0020 MDI 1, MDI 2, and MDI 3 Cooling Towers

Group Members: EQT0393 EQT0394 EQT0422 EQT0442 EQT0443

- 1 [40 CFR 63.102(a)]
- 2 [40 CFR 63.103(e)(1)]
- 3 [40 CFR 63.103(c)]
- 4 [40 CFR 63.104(b)]
- 5 [40 CFR 63.104(d)]
- 6 [40 CFR 63.104(e)]
- 7 [40 CFR 63.104(f)(2)]

Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
 Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
 Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]
 Heat exchange systems (cooling water): HAP monitored by the regulations specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more specified HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b), 40 CFR 63.104(b)(1)]

Which Months: All Year Statistical Basis: None specified

Heat exchange Systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d), 40 CFR 63.104(d)(1), 40 CFR 63.104(d)(2)]
 Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]
 If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of subpart G of this part. If the leak remains unpaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2)]

CRG0021 MDI 2 DADPM Batch Operation - Reactors MR-6105A, B, C, D, MR-6107, and MR-6106

Group Members: EQT0596 EQT0597 EQT0599 EQT0600 EQT0604

- 8 [40 CFR 63.240(b)]
- 9 [40 CFR 63.2520(b)]
- 10 [40 CFR 63.2525(e)(4)]
- 11 [LAC 33:III.2149.G.1.a]
- 12 [LAC 33:III.2149.G]

Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
 Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
 Keep records of each day a batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
 Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year, and 3) Average flow rate in scfm and verifying documentation.
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 and G.2 for each process vent contained in the batch process.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

CRG0022 Reactors MR-4210 through MR-4216

Group Members: EQT094 EQT0643 EQT0644 EQT0645 EQT0646 EQT0647 EQT0833

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33.III.2147.F.1 through F.4, as applicable.

CRG0023 AS-4101, AS-4103, and AS-4104

Group Members: EQT0612 EQT0613 EQT0614

- 14 [40 CFR 63.113(d)] TRE index value > 1.0 and <= 4.0 (no units). Subpart G. [40 CFR 63.113(d)] Which Months: All Year Statistical Basis: None specified Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group vent. Subpart G. [40 CFR 63.115(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)] Each owner or operator who elects to comply with the requirements of 40 CFR 63.113 of this subpart shall submit to the Administrator Periodic Reports of the recorded information in 40 CFR 63.118(f)(1) through 40 CFR 63.118(f)(6) according to the schedule in 40 CFR 63.152 of this subpart. [40 CFR 63.118(f)]

CRG0024 Coolers and Condensers

Group Members: EQT0703 EQT0762 EQT0763 EQT0764 EQT0765 EQT0766 EQT0767 EQT0768 EQT0769 EQT0776 EQT0777 EQT0778 EQT0779 EQT0780 EQT0781 EQT0782 EQT0783 EQT0791 EQT0792 EQT0793 EQT0794 EQT0795 EQT0796 EQT0797 EQT0798 EQT0799 EQT0800 EQT0903 EQT0904 EQT0905 EQT0906

- 18 [40 CFR 63.102(a)] Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)] Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)] Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)] Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b), 40 CFR 63.104(b)(1)] Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

CRG0024 Coolers and Condensers

- 22 [40 CFR 63.104(d)] Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d), 40 CFR 63.104(d)(1), 40 CFR 63.104(d)(2)]
- 23 [40 CFR 63.104(e)] Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]
- 24 [40 CFR 63.104(e)] Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]
- 25 [40 CFR 63.104(f)(2)] If an owner of operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of subpart G of this part. If the leak remains unrepairs, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2)]
- 26 [40 CFR 63.104(f)] Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(f)(1) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]
- 27 [LAC 33.111.5109.A] Monitor influent and effluent of cooling tower to detect MCB, methylene dianiline, and/or aniline leak per 40 CFR 63.104(b).

CRG0025 TT-4401 and TT-5401

Group Members: EQT0799 EQT0800

- 28 [40 CFR 63.102(a)] Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
- 29 [40 CFR 63.103(c)(1)] Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
- 30 [40 CFR 63.103(c)] Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]
- 31 [40 CFR 63.104(b)] Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more specified HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b), 40 CFR 63.104(b)(1)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20080019
Permit Number: 2391-V09
Air - Title V Regular Permit Renewal

CRG0025 TT-4401 and TT-9401

32 [40 CFR 63.104(b)] Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more specified HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b)]

Which Months: All Year Statistical Basis: None specified

Monitor cooling water system for exchanger leak. [40 CFR 63.104(b)]

Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d)] Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]

If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of subpart G of this part. If the leak remains unpaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2)]

Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(f)(1)(i) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]

CRG0027 MS-4115, 6115, 4156, 6121, 6156, and 4251

Group Members: EQT0377 EQT0470 EQT0864 EQT0865

38 [40 CFR 63.100] System meets control requirements for oil/water separator in Table 35 of 40 CFR 63.149. No further control is required. [40 CFR 63.100, 40 CFR 63.149]
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33;III.2109.D.2.

CRG0028 EQT 791 - EQT 798

Group Members: EQT0791 EQT0792 EQT0793 EQT0794 EQT0795 EQT0796 EQT0797 EQT0798

40 [40 CFR 63.102(a)] Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
 41 [40 CFR 63.103(c)(1)] Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
 42 [40 CFR 63.103(c)] Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]

SPECIFIC REQUIREMENTS

AID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

CRG0028 EQT 791 - EQT 798

43 [40 CFR 63.104(b)]

Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b), 40 CFR 63.104(b)(1)]

44 [40 CFR 63.104(d)]

Which Months: All Year Statistical Basis: None specified
 Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d), 40 CFR 63.104(d)(1), 40 CFR 63.104(d)(2)]

45 [40 CFR 63.104(e)]

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]

46 [40 CFR 63.104(e)]

Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]

47 [40 CFR 63.104(f)(2)]

If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of subpart G of this part. If the leak remains unpaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2)]

48 [40 CFR 63.104(f)(2)]

If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of subpart G of this part. If the leak remains unpaired, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2)]

49 [40 CFR 63.104(f)]

Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(f)(1)(i) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]

50 [LAC 33.111.5109.A]

Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

CRG0029 Phosgene Reactor Operation MR-9401A/B/C

Group Members: EQT0609 EQT0610 EQT0611

51 [40 CFR 60.700 - 718]

Complies with 40 CFR 60 Subpart RRR by complying with required provisions of 40 CFR 65 detailed in Part 70 Specific Conditions 1 and 2 of the word document of this permit.

Permittee shall reduce emissions by 98% or greater or to an outlet concentration of 20 ppmv or less, whichever is less stringent, except during periods of startup, shutdown or malfunction (SSM). Submit initial notification and periodic reports. Maintain updated SSM plan. [40 CFR 65.5(a), 40 CFR 65.6(b), 40 CFR 65.63(a)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

CRG0029 Phosgene Reactor Operation MR-9401A/B/C

Monitor boiler temperature continuously and record daily average. Keep records of TRE. Report performance test results. Report events when the daily average temperature is below the minimum and startups and shutdowns semiannually. 40 CFR 149(c). [40 CFR 65.66(a), 40 CFR 65.161(a), 40 CFR 65.161(c), 40 CFR 65.164, 40 CFR 65.166(f), 40 CFR 65.167]

CRG0030 HCl Storage Tanks and HCl Loading

Group Members: EQT1197 EQT1198 EQT1199 EQT1200 EQT1201 EQT1202 EQT1203 EQT1204 EQT1205 EQT1206

- 53 [40 CFR 65.66(a)] Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Conduct all applicable performance tests according to the procedures in 40 CFR 63.9020 on the earlier of the title V operating permit renewal or within 5 years of issuance of the title V permit. Also conduct all applicable performance tests whenever process changes are made that could reasonably be expected to increase the outlet concentration. Subpart NNNNN. [40 CFR 63.9015(a)]
 Submit performance test results: Due within 60 days after the completion of subsequent performance tests. Also verify that the operating limits have not changed or provide documentation of revised operating limits established as specified in 40 CFR 63 Subpart NNNNN, Table 2. Include all applicable information required in 40 CFR 63.9050. Subpart NNNNN. [40 CFR 63.9015(b)]
 Conduct each applicable performance test in 40 CFR 63 Subpart NNNNN, Table 3 as directed in 40 CFR 63.9020(e)(1) through (4), except as noted in 40 CFR 63.9020(b) and (c). Subpart NNNNN. [40 CFR 63.9020(a)]
 If complying with a percent reduction emission limitation, determine the percent reduction in accordance with 40 CFR 63.9020(b)(1) and (b)(2). Subpart NNNNN. [40 CFR 63.9020(b)]
 Prepare a design evaluation that includes documentation demonstrating that the control technique being used achieves the required control efficiency when a liquid HCl product with the concentration of 30 weight percent or greater is being loaded into the storage tank, or a tank truck, rail car, ship, or barge. Subpart NNNNN. [40 CFR 63.9020(c)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4, and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]

EQT0369 KB - MDI 1 Fume Scrubber AS-4303A/B

- 61 [40 CFR 63.113(a)(3)] TRE index value > 1.0 (no unis) at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0 the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (e) of this section, whichever is applicable. Subpart G. [40 CFR 63.113(a)(3)]
 Which Months: All Year Statistical Basis: None specified
 Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]
 Flow rate >= 64727 lb/hr.
 Which Months: All Year Statistical Basis: Daily average
 Flow rate monitored by flow rate monitoring device continuously.
 Which Months: All Year Statistical Basis: None specified
 Flow rate recordkeeping by electronic or hard copy continuously.

SPECIFIC REQUIREMENTS

All ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
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EQT0369 KB - MDI 1 Fume Scrubber AS-4303A/B

66 [40 CFR 63.9000]

pH >= 10.54 and <= 12.75 s.u.

Which Months: All Year Statistical Basis: Daily average
 Group 2 HON process vents, which meet the requirements of 40 CFR 63.100 and 113(a)(3), are routed to this scrubber. Emits Class I and Class II TAP less than the MER (facility wide). No further control is required.**EQT0370 KC - MDI 1 Caustic Scrubber AS-4304B**

68 [40 CFR 63.100]

Monitor scrubber effluent stream pH, Phosgene Plant Vent inlet temperature and HCl Absorber Vent outlet temperatures continuously. Keep records of performance tests, TRE and daily average pH and vent condenser temperatures. Periodic reports are due semi-annually (40 CFR 60.114(b), 40 CFR 60.117(a)(7), 40 CFR 60.117(e), 40 CFR 60.118(f). [40 CFR 63.100, 40 CFR 63.113(a)(2)]
 Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). Subpart G. [40 CFR 63.113(a)(2)]

70 [40 CFR 63.113(a)(3)]

Which Months: All Year Statistical Basis: None specified
 TRE index value > 1.0 (no units) at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0 the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (e) of this section, whichever is applicable. Subpart G. [40 CFR 63.113(a)(3)]

71 [40 CFR 63.9000(a)]

Which Months: All Year Statistical Basis: None specified
 Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]
 "A" Caustic Scrubber - Flow rate: >= 79015 lb/hr
 "B" Caustic Scrubber - Flow rate: >= 79420 lb/hr

72 [40 CFR 63.9000]

Which Months: All Year Statistical Basis: Daily Average.
 Flow rate monitored by flow rate monitoring device continuously.

73 [40 CFR 63.9000]

Which Months: All Year Statistical Basis: None specified
 Flow rate recordkeeping by electronic or hard copy continuously.
 pH >= 10.19 and <= 12.98 s.u.

74 [40 CFR 63.9000]

Which Months: All Year Statistical Basis: Daily average
 pH monitored by pH instrument continuously.

75 [40 CFR 63.9000]

Which Months: All Year Statistical Basis: None specified
 pH recordkeeping by electronic or hard copy continuously.
 Shall comply with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 113(a)(2).**EQT0375 MF-4118 - Storage Vessel**

79 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy upon measurement. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]
 Compliance with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 119(a)(3) constitutes MACT. No further control required.

80 [LAC 33.III.5109.A]

TPOR0147

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0388 KJ - Pure 1 Bulk Tank MS-4910

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0389 KK - Pure 1 Mother Liquor Bulk Tank MS-4913

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0392 KT - DADPM Rail Car/Truck Loading

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0396 MF-4503C - Storage Vessel

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0399 KZ - M1-50 Storage Tank MS-4968

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0400 MA - MDI 2 Caustic Scrubber AS-6304B

Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]
 "A" Caustic Scrubber - 10.66 s.u. >= pH >= 13.01 s.u.
 "B" Caustic Scrubber - 10.66 s.u. >= pH >= 13.01 s.u.
 Quench Scrubber - 8.46 s.u. >= pH >= 11.87 s.u.
 Which Months: All Year Statistical Basis: Daily Average.
 "A" Caustic Scrubber - Flow rate: >= 401 gallons/min
 "B" Caustic Scrubber - Flow rate: >= 297 gallons/min
 Quench Scrubber - Flow rate: >= 189 gallons/min
 Which Months: All Year Statistical Basis: Daily Average.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0400 MA - MDI 2 Caustic Scrubber AS-6304B

- 89 [40 CFR 63.9000] Flow rate monitored by flow rate monitoring device continuously.
Which Months: All Year Statistical Basis: None specified
- 90 [40 CFR 63.9000] Flow rate recordkeeping by electronic or hard copy continuously.
- 91 [40 CFR 63.9000] pH monitored by pH instrument continuously.
Which Months: All Year Statistical Basis: None specified
- 92 [40 CFR 63.9000] pH recordkeeping by electronic or hard copy continuously.

EQT0401 MF-6217A - Storage Vessel

- 93 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0413 MH-1 - Storage Vessel MF-4519

- 94 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0414 MH-2 - EMDI Reactor MR-4513

- 95 [40 CFR 63.2460(b)] Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(c)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
- 96 [40 CFR 63.2520(b)] Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
- 97 [40 CFR 63.2525(e)(4)] Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
- 98 [LAC 33:III.2149.G.1.a] Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year; and 3) Average flow rate in scfm and verifying documentation.
- 99 [LAC 33:III.2149.G] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 for each process vent contained in the batch process.

EQT0415 MK - Variants Storage Tank MF-4945

- 100 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0416 MM - MDI Bulk Tank MF-4503F

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

EQT0416 MM - MDI Bulk Tank MF-4503F

- 101 [40 CFR 63.123(a)]
 102 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0417 MN - MDI Bulk Tank MF-4503G

- 103 [40 CFR 63.130(f)]
 104 [40 CFR 63.130(f)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0420 MQ - MDI Truck Loading/Unloading

- 105 [40 CFR 63.102(a)]
 106 [40 CFR 63.103(c)(1)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0421 MR - MDI Railcar Loading/Unloading

- 107 [40 CFR 63.103(c)]
 108 [40 CFR 63.104(b)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0422 MU - MDI 2 Cooling Tower GT-6501

- 109 [40 CFR 63.104(d)]

Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
 Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
 Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]
 Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b), 40 CFR 63.104(b)(1)]
 Which Months: All Year Statistical Basis: None Specified
 Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d), 40 CFR 63.104(d)(1), 40 CFR 63.104(d)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-V09

Air - Title V Regular Permit Renewal

EQT0423 MW - Variants Reactor "D" MR-4841

- 110 [40 CFR 63.2460(b)] Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
 111 [40 CFR 63.2520(b)] Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
 112 [40 CFR 63.2525(e)(4)] Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
 Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year; and 3) Average flow rate in scfm and verifying documentation.
 113 [LAC 33:III.2149.G.1.a] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 for each process vent contained in the batch process.

EQT0424 MX - Variants Product Storage Tank MF-4503J

- 115 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0439 NN - Variants "C" Reactor MR-4901

- 116 [40 CFR 63.2460(b)] Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
 117 [40 CFR 63.2520(b)] Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
 118 [40 CFR 63.2525(e)(4)] Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
 Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year; and 3) Average flow rate in scfm and verifying documentation.
 119 [LAC 33:III.2149.G.1.a] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 for each process vent contained in the batch process.

EQT0440 NO - Variants "A" Reactor MR-4816

- 121 [40 CFR 63.2460(b)] Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
 122 [40 CFR 63.2520(b)] Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
 123 [40 CFR 63.2525(e)(4)] Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
 Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year; and 3) Average flow rate in scfm and verifying documentation.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0440 NO - Variants "A" Reactor MR-4816

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 for each process vent contained in the batch process.

EQT0441 NP - Variants "B" Reactor MR-4840

- 126 [40 CFR 63.2460(b)] Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
 127 [40 CFR 63.2520(b)] Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
 128 [40 CFR 63.2525(e)(4)] Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
 129 [LAC 33:III.2149.G.1.a] Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year, and 3) Average flow rate in scfm and verifying documentation.
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 for each process vent contained in the batch process.

EQT0444 ZE - MDI 3 Caustic Scrubber AS-9304B

- 131 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]
 "A" Caustic Scrubber - 10.32 s.u. >= pH >= 13 s.u.
 "B" Caustic Scrubber - 10.32 s.u. >= pH >= 13 s.u.
 Quench Scrubber - 8.27 s.u. >= pH >= 12.79 s.u.
 Which Months: All Year Statistical Basis: Daily Average.
 "A" Caustic Scrubber - Flow rate: >= 828 gallons/min
 "B" Caustic Scrubber - Flow rate: >= 381 gallons/min
 Quench Scrubber - Flow rate: >= 189 gallons/min
 Which Months: All Year Statistical Basis: Daily Average.
 Flow rate monitored by flow rate monitoring device continuously.
 Which Months: All Year Statistical Basis: None specified
 Flow rate recordkeeping by electronic or hard copy continuously.
 pH monitored by pH instrument continuously.
 Which Months: All Year Statistical Basis: None specified
 pH recordkeeping by electronic or hard copy continuously.

EQT0445 MF-9217A - Storage Vessel

SPECIFIC REQUIREMENTS

All ID: 1468 - Rubicon LLC - Galmar Plant
 Activity Number: PER20080019
 Permit Number: 2391-Y09
 Air - Title V Regular Permit Renewal

EQT0445 MF-9217A - Storage Vessel

138 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0449 ZI - MDI 2 Fume Scrubber AS-6303

- 139 [40 CFR 63.113(a)(3)] TRE index value > 1.0 (no units) at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0 the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (e) of this section, whichever is applicable. Subpart G. [40 CFR 63.113(a)(3)]
- 140 [LAC 33.III.501.C.6] Which Months: All Year Statistical Basis: None specified Flow rate > 50 gallons/min.
- 141 [LAC 33.III.501.C.6] Which Months: All Year Statistical Basis: Daily average Flow rate monitored by flow rate monitoring device continuously.
- 142 [LAC 33.III.501.C.6] Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by electronic or hard copy continuously.

EQT0451 ZM - MDI 3 Truck Loading/Unloading

- 143 [40 CFR 63.130(f)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0452 ZN - MDI 3 Railcar Loading/Unloading

- 144 [40 CFR 63.130(f)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0453 ZO - Variants Reactor "F" MR-4842

- 145 [40 CFR 63.2460(b)] Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]
- 146 [40 CFR 63.2520(b)] Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]
- 147 [40 CFR 63.2525(e)(4)] Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]
- 148 [LAC 33.III.2149.G.1.a] Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year, and 3) Average flow rate in scfm and verifying documentation.
- 149 [LAC 33.III.2149.G] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33.III.2149.G.1 for each process vent contained in the batch process.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0454 ZP - Variants Product Storage Tank MF-4503M

150 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0455 ZQ - Pure 2 MI-30 Storage Tank MS-6716

151 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0463 ZT - Pure 3 Truck Loading/Unloading

152 [40 CFR 63.130(f)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)]

EQT0464 ZW - Variants CCP Product Storage Tank MF-4503N

153 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT0474 ZA - MDI 3 Fume Scrubber AS-9303

154 [40 CFR 63.113(a)(3)] TRE index value > 1.0 (no units) at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0 the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (e) of this section, whichever is applicable. Subpart G. [40 CFR 63.113(a)(3)]
 Which Months: All Year Statistical Basis: None specified
 Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]
 Flow rate >= 5.65 gallons/min.
 Which Months: All Year Statistical Basis: Daily average
 pH >= 8 and <= 14 s.u.
 Which Months: All Year Statistical Basis: Daily average
 Flow rate monitored by flow rate monitoring device continuously.
 Which Months: All Year Statistical Basis: None specified
 Flow rate recordkeeping by electronic or hard copy continuously.
 Group 2 HON process vents, which meet the requirements of 40 CFR 63.100 and 113(a)(3), are routed to this scrubber. Vents to control devices which constitutes MACT. No further control is required.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geldsmar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0475 ZV - Startup and Shutdown Emissions

- 161 [40 CFR 63.6(e)(3)] Develop and maintain a Startup, Shutdown and Malfunction Plan. [40 CFR 63.6(e)(3)]
 162 [40 CFR 63.6(e)] Shall comply with operation and maintenance requirements. [40 CFR 63.6(e)]
 163 [LAC 33.III.5109.A] MDI plan complies with HON Startup, Shutdown and Malfunction provisions per 40 CFR 63.6(c) as MACT. No additional controls required.

EQT0476 MF-6302A - HCl Storage Tank

- 164 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0477 MF-6302B - HCl Storage Tank

- 165 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0478 MF-6302C - HCl Storage Tank

- 166 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0479 MS-4302B - HCl Storage Tank

- 167 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0480 MS-4302C - HCl Storage Tank

- 168 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0481 MS-4302D - HCl Storage Tank

- 169 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0482 MS-4302E - HCl Storage Tank

- 170 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-V09
Air - Title V Regular Permit Renewal

EQT0483 MF-4302F - HCl Storage Tank

171 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0484 MF-4302G - HCl Storage Tank

172 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0485 MF-9302A - HCl Storage Tank

173 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0486 MF-9302B - HCl Storage Tank

174 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0497 MF-4302A - HCl Day Storage

175 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0513 MS-4304 - HCl Run Down

176 [40 CFR 63.9000(a)] Reduce HCl emissions by 99% or greater or to an outlet concentration of 120 ppmv or less (40 CFR 63.9000(a), 63.9075 Table 1). Subpart NNNNN. [40 CFR 63.9000(a), 40 CFR 63.9075]

EQT0556 MS-4162 - Reflux

177 [LAC 33.III.2103.E.1] VOC, Total \geq 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
 Which Months: All Year Statistical Basis: None specified

EQT0569 MS-4207 - Phosgene Mixing Vessel

178 [LAC 33.III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0569 MS-4207 - Phosgene Mixing Vessel

The specifications and requirements in Paragraph E. 1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E. 1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0570 MS-4404 - Phosgene Absorber Emergency Storage

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E. 1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E. 1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0571 MS-6310 - Phosgene Absorber Emergency Storage

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E. 1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E. 1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0572 MS-9310 - Phosgene Absorber Emergency Storage

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E. 1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E. 1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0573 MS-4403 - Phosgene Level Pot

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E. 1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E. 1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0574 MS-4211 - Recovery Column Feed

188 [LAC 33:III.2103.E.1]

VOC, Total $\geq 95\%$ control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0575 MS-6211 - Recovery Column Feed

190 [LAC 33:III.2103.E.1]

VOC, Total $\geq 95\%$ control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0576 MS-9211 - Recovery Column Feed

192 [LAC 33:III.2103.E.1]

VOC, Total $\geq 95\%$ control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.

Which Months: All Year Statistical Basis: None specified

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0577 MS-9704 - Hot MCB Circulation Tank

194 [LAC 33:III.2103.A]

Maintain working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0578 MR-6207 - PI Batch Reactor

196 [40 CFR 63.2460(b)]

Group 2 Batch Process Vent. Calculate uncontrolled batch emissions. Comply with the applicable monitoring, recordkeeping and reporting provisions. Subpart FFFF. [40 CFR 63.2525(e)(4), 40 CFR 63.2520(b), 40 CFR 63.2460(b)]

Submit semiannual reports. Subpart FFFF. [40 CFR 63.2520(b)]

Keep records of each day a batch was completed, whether the batch was a standard batch, and the number of batches made on a twelve month rolling average and update monthly. Subpart FFFF. [40 CFR 63.2525(e)(4)]

SPECIFIC REQUIREMENTS

All ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

Permit Number: 2391-Y09

Air - Title V Regular Permit Renewal

EQT0578 MR-6207 - PI Batch Reactor

199 [LAC 33:III.2149.G.1.a]

Record 1) Annual mass emission total and verifying documentation; 2) Permitted number of emission events per year; and 3) Average flow rate in scfm and verifying documentation.

200 [LAC 33:III.2149.G]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2149.G.1 for each process vent contained in the batch process.

EQT0579 MR-4201 - MDI 1 Phosgenation Reactor Operation

201 [40 CFR 63.113(a)(2)]

VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

Comply with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 40 CFR 63.113(a)(2).

EQT0580 MR-4202 - MDI 1 Phosgenation Reactor Operation

203 [40 CFR 63.113(a)(2)]

VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

Comply with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 40 CFR 63.113(a)(2).

EQT0581 MR-4203 - MDI 1 Phosgenation Reactor Operation

204 [LAC 33:III.5109.A]

VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

Comply with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 40 CFR 63.113(a)(2).

EQT0582 MR-4204 - MDI 1 Phosgenation Reactor Operation

205 [40 CFR 63.113(a)(2)]

VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

Comply with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 40 CFR 63.113(a)(2).

EQT0584 MR-6202 - MDI 2 Phosgenation Reactor Operation

206 [LAC 33:III.5109.A]

Vents to control devices (GRP 41) which constitutes MACT.

EQT0585 MR-6203 - MDI 2 Phosgenation Reactor Operation

TPOR0147

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0585 MR-6203 - MDI 2 Phosgenation Reactor Operation

210 [LAC 33:III.5109.A] Vents to control devices (GRP 41) which constitutes MACT.

EQT0586 MR-6204 - MDI 2 Phosgenation Reactor Operation

211 [LAC 33:III.5109.A] Vents to control devices (GRP 41) which constitutes MACT.

EQT0587 MR-4401A - Phosgene Reactor Operation

212 [40 CFR 63.113(a)(2)] VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

EQT0588 MR-4401B - Phosgene Reactor Operation

213 [40 CFR 63.113(a)(2)] VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

EQT0589 MR-4401C - Phosgene Reactor Operation

214 [40 CFR 63.113(a)(2)] VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

EQT0590 MR-4401D - Phosgene Reactor Operation

215 [40 CFR 63.113(a)(2)] VOC or Organic HAP >= 95 % recovery efficiency, or exit concentration <= 20 ppmv, whichever is less stringent. Subpart H. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

EQT0615 AS-4800 - Pure 1 Splitting Distillation Column

216 [40 CFR 63.113(e)] TRE index value > 4.0 (no units). Subpart G. [40 CFR 63.113(e)]
 Which Months: All Year Statistical Basis: None specified
 Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group 1 vent. Subpart G. [40 CFR 63.115(e)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-W09
 Air - Title V Regular Permit Renewal

EQT0615 AS-4800 - Pure 1 Splitting Distillation Column

- 218 [40 CFR 63.117(b)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records of measurements, engineering assessments, and calculations performed to determine the TRE index value of the vent stream. [Include all data, assumptions and procedures used for the engineering assessments, as specified in 40 CFR 63.115(d)(1). Subpart G. [40 CFR 63.117(b)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0. Include the information specified in 40 CFR 63.118(h)(1) through (h)(3). Subpart G. [40 CFR 63.118(h)] Comply with NESHAP (HON) Subparts F and G, 40 CFR 63.100 and 40 CFR 63.113.
- 219 [40 CFR 63.118(h)]
- 220 [LAC 33-HI.5109.A]

EQT0623 AS-4201 - MDI 1 MCB Recovery Distillation Column

- 221 [40 CFR 63.113(a)(2)] Organic HAP > 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). Subpart G. [40 CFR 63.113(a)(2)] Which Months: All Year Statistical Basis: None specified

EQT0626 AS-4202 - MDI 1 Purification Distillation Column

- 222 [40 CFR 63.113(d)] TRE index value > 1.0 (no units). Subpart G. [40 CFR 63.113(d)] Which Months: All Year Statistical Basis: None specified Temperature monitored by temperature monitoring device continuously. Equip the organic monitoring device with a continuous recorder. Subpart G. [40 CFR 63.114(b)] Which Months: All Year Statistical Basis: None specified Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group 1 vent. Subpart G. [40 CFR 63.115(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculations of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent to become a Group 1 process vent. Include the information specified in 40 CFR 63.118(g)(1) through (g)(3). Subpart G. [40 CFR 63.118(g)]

EQT0627 AS-4203 - MDI 1 Phosgene Absorber Column

- 227 [40 CFR 63.113(d)] TRE index value > 1.0 (no units). Subpart G. [40 CFR 63.113(d)] Which Months: All Year Statistical Basis: None specified Temperature monitored by temperature monitoring device continuously. Equip the organic monitoring device with a continuous recorder. Subpart G. [40 CFR 63.114(b)] Which Months: All Year Statistical Basis: None specified
- 228 [40 CFR 63.114(b)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-Y09
 Air - Title V Regular Permit Renewal

EQT0627 AS-4203 - MDI 1 Phosgene Absorber Column

- 229 [40 CFR 63.115(e)] Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group 1 vent. Subpart G. [40 CFR 63.115(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
- 230 [40 CFR 63.113(c)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent to become a Group 1 process vent. Include the information specified in 40 CFR 63.118(g)(1) through (g)(3). Subpart G. [40 CFR 63.118(g)]

EQT0628 AS-6101 - DADPM 2 DADPM Stripper Distillation Column

- 232 [40 CFR 63.113(d)] TRE index value > 1.0 (no units). Subpart G. [40 CFR 63.113(d)] Which Months: All Year Statistical Basis: None specified Temperature monitored by temperature monitoring device continuously. Equip the organic monitoring device with a continuous recorder. Subpart G. [40 CFR 63.114(b)]
- 233 [40 CFR 63.114(b)] Which Months: All Year Statistical Basis: None specified Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group 1 vent. Subpart G. [40 CFR 63.115(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
- 234 [40 CFR 63.115(e)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent to become a Group 1 process vent. Include the information specified in 40 CFR 63.118(g)(1) through (g)(3). Subpart G. [40 CFR 63.118(g)]

EQT0629 AS-6103 - Effluent Recovery Distillation Column

- 237 [40 CFR 63.113(d)] TRE index value > 1.0 (no units). Subpart G. [40 CFR 63.113(d)] Which Months: All Year Statistical Basis: None specified Temperature monitored by temperature monitoring device continuously. Equip the organic monitoring device with a continuous recorder. Subpart G. [40 CFR 63.114(b)]
- 238 [40 CFR 63.114(b)] Which Months: All Year Statistical Basis: None specified Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group 1 vent. Subpart G. [40 CFR 63.115(e)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]

SPECIFIC REQUIREMENTS

All ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-Y09
 Air - Title V Regular Permit Renewal

EQT0629 AS-6103 - Effluent Recovery Distillation Column

241 [40 CFR 63.118(g)] Submit report. Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent to become a Group 1 process vent. Include the information specified in 40 CFR 63.118(g)(1) through (g)(3). Subpart G. [40 CFR 63.118(g)]

EQT0630 AS-6104 - Effluent Recovery Distillation Column

242 [40 CFR 63.113(d)] TRE index value > 1.0 (no units). Subpart G. [40 CFR 63.113(d)]
 Which Months: All Year Statistical Basis: None specified
 Temperature monitored by temperature monitoring device continuously. Equip the organic monitoring device with a continuous recorder.
 Subpart G. [40 CFR 63.114(b)]
 Which Months: All Year Statistical Basis: None specified
 Recalculate the TRE index value, flow, or organic hazardous air pollutants concentration for each process vent, as necessary to determine whether the vent is Group 1 or Group 2, whenever process changes are made that could reasonably be expected to change the vent to a Group 1 vent. Subpart G. [40 CFR 63.115(e)]
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
 Submit report. Due within 180 calendar days after a process change, as defined in 40 CFR 63.118(g)(1) through (g)(3). Subpart G. [40 CFR 63.118(g)] to become a Group 1 process vent. Include the information specified in 40 CFR 63.118(g)(1) through (g)(3). Subpart G. [40 CFR 63.118(g)]

EQT0689 TT-4302 - HCl Absorber Condenser

247 [40 CFR 61. Subpart G] Temperature recordkeeping by electronic or hard copy daily.
 248 [40 CFR 63. Subpart G] Temperature <= 71 F.
 Which Months: All Year Statistical Basis: Daily average

EQT0754 TT-4804 - 1st Guard Condenser

249 [40 CFR 63. Subpart G] TRE index value > 4 (no units).
 Which Months: All Year Statistical Basis: Daily average
 TRE index value recordkeeping by electronic or hard copy daily.
 250 [40 CFR 63. Subpart G]

EQT0760 TT-4119 - DADPM Stripper Bottoms Cooler

251 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 252 [LAC 33.111.5109 A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0761 TT-6119 - DADPM Stripper Bottoms Cooler

253 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20080019
Permit Number: 2391-V09
Air - Title V Regular Permit Renewal

EQT0761 TT-6119 - DADPM Stripper Bottoms Cooler

254 [40 CFR 63.104(b)] Monitor influent and effluent of cooling tower to detect methylene dianiline leak. [40 CFR 63.104(b)]

EQT0791 TT-4101A - DADPM Reactor Cooler

255 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 256 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0792 TT-4101B - DADPM Reactor Cooler

257 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 258 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0793 TT-6101A - DADPM Reactor Cooler

259 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 260 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0794 TT-6101B - DADPM Reactor Cooler

261 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 262 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0795 TT-6101C - DADPM Reactor Cooler

263 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 264 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0796 TT-6101D - DADPM Reactor Cooler

265 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 266 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0797 TT-6101E - DADPM Reactor Cooler

267 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 268 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-Y09
 Air - Title V Regular Permit Renewal

EQT0798 TT-6101F - DADPM Reactor Cooler

- 269 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak [40 CFR 63.104(b)]
 270 [LAC 33:III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0818 MM-4304 - Caustic Scrubber Header KO

- 271 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0819 MM-6304 - Caustic Scrubber Header KO

- 273 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0820 MM-9304 - Caustic Scrubber Header KO

- 275 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0821 MS-4205 - Reactor Air Cond. Separator KO

- 277 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0822 MS-6205 - Reactor Air Cond. Separator KO

279 [LAC 33:III.2|03.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0823 MS-9205 - Reactor Air Cond. Separator KO

281 [LAC 33:III.2|03.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0824 MS-4229 - Vacuum Pump Separator KO

282 [LAC 33:III.2|03.E.3] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0825 MS-6229 - Vacuum Pump Separator KO

283 [LAC 33:III.2|03.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

The specifications and requirements in Paragraph E.1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E.1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0826 MS-9229 - Vacuum Pump Separator KO

287 [LAC 33:III.2|03.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

TPOR0147

SPECIFIC REQUIREMENTS

All ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0826 MS-9229 - Vacuum Pump Separator KO

288 [LAC 33:III.2]03.E.3]

The specifications and requirements in Paragraph E 1 and 2 of this Section do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of the vapor loss control system, during which the vapor loss control system does not meet the specifications of Paragraph E. 1 or 2 of this Section, as applicable, shall not exceed 240 hours per year.

EQT0867 TT-4123 - MDI 1 DADPM Plant Vent Condenser

289 [40 CFR 63 Subpart G]	Temperature <= 100 F. Which Months: All Year	Statistical Basis: Daily average
290 [40 CFR 63 Subpart G]	Temperature monitored by temperature monitoring device daily. Which Months: All Year	Statistical Basis: None specified
291 [40 CFR 63 Subpart G]	Temperature recordkeeping by electronic or hard copy daily.	

EQT0868 TT-4129 - Methanol Fractionator Vent Condenser

292 [40 CFR 63 Subpart G]	Temperature <= 60 F. Which Months: All Year	Statistical Basis: Daily average
293 [40 CFR 63 Subpart G]	Temperature recordkeeping by electronic or hard copy daily.	

EQT0871 TT-4402 - Phosgene Vent Condenser

294 [40 CFR 63 Subpart G]	Temperature <= 130 F. Which Months: All Year	Statistical Basis: Daily average
295 [40 CFR 63 Subpart G]	Temperature recordkeeping by electronic or hard copy daily.	

EQT0872 TT-4233 - Vacuum Pump Separator Condenser

296 [40 CFR 63 Subpart G]	Temperature <= 25 F. Which Months: All Year	Statistical Basis: Daily average
297 [40 CFR 63 Subpart G]	Temperature recordkeeping by electronic or hard copy daily.	

EQT0873 TT-6123 - DADPM Plant Vent Condenser

298 [40 CFR 63 Subpart G]	Temperature <= 59 F. Which Months: All Year	Statistical Basis: Daily average
299 [40 CFR 63 Subpart G]	Temperature recordkeeping by electronic or hard copy daily.	

EQT0874 TT-6129 - Methanol Fractionator Vent Condenser

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT0874 TT-6129 - Methanol Fractionator Vent Condenser

- | | |
|---------------------------|---|
| 300 [40 CFR 63.113(a)(3)] | Temperature <= 60 F.
Which Months: All Year
Statistical Basis: Daily average
Temperature recordkeeping by electronic or hard copy daily. |
|---------------------------|---|

EQT0896 AS-6117 A - DADPM Continuous Isomerization Column

- Achieve and maintain a TRE index value greater than 1.0 at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0, the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (3) of this section, whichever is applicable. Subparts F and G - Process Vent Provisions. [40 CFR 63.113(a)(3)]
- Monitor DADPM Distillation/Effluent Vent and Methanol Fractionator Vent condenser outlet temperatures continuously and record daily average temperature. Subparts F and G - Process Vent Provisions. [40 CFR 63.114(b)]
- Submit semiannual reports. Subparts F and G - Process Vent Provisions. [40 CFR 63.118(f)]

EQT0897 AS-6117 B - DADPM Continuous Isomerization Column

- Achieve and maintain a TRE index value greater than 1.0 at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0, the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (3) of this section, whichever is applicable. Subparts F and G - Process Vent Provisions. [40 CFR 63.113(a)(3)]
- Monitor DADPM Distillation/Effluent Vent and Methanol Fractionator Vent condenser outlet temperatures continuously and record daily average temperature. Subparts F and G - Process Vent Provisions. [40 CFR 63.114(b)]
- Submit semiannual reports. Subparts F and G - Process Vent Provisions. [40 CFR 63.118(f)]

EQT0898 AS-6112 - CDU HCl Absorber Column

- Achieve and maintain a TRE index value greater than 1.0 at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0, the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (3) of this section, whichever is applicable. Subparts F and G - Process Vent Provisions. [40 CFR 63.113(a)(3)]
- Monitor DADPM Distillation/Effluent Vent and Methanol Fractionator Vent condenser outlet temperatures continuously and record daily average temperature. Subparts F and G - Process Vent Provisions. [40 CFR 63.114(b)]
- Submit semiannual reports. Subparts F and G - Process Vent Provisions. [40 CFR 63.118(f)]

EQT0900 MR-6111 - CDU Feed Drum

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-W09
 Air - Title V Regular Permit Renewal

EQT0900 MR-6111 - CDU Feed Drum

- 311 [40 CFR 63.113(a)(3)] Achieve and maintain a TRE index value greater than 1.0 at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0, the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (3) of this section, whichever is applicable. Subparts F and G - Process Vent Provisions. [40 CFR 63.113(a)(3)]
 Monitor DADPM Distillation/Effluent Vent and Methanol Fractionator Vent condenser outlet temperatures continuously and record daily average temperature. Subparts F and G - Process Vent Provisions. [40 CFR 63.114(b)]
 Submit semiannual reports. Subparts F and G - Process Vent Provisions. [40 CFR 63.118(f)]

EQT0901 MR-6124 - Neutralizer

- 314 [40 CFR 63.113(a)(3)] Achieve and maintain a TRE index value greater than 1.0 at the outlet of the final recovery device, or prior to release of the vent stream to the atmosphere if no recovery device is present. If the TRE index value is greater than 1.0, the process vent shall comply with the provisions for a Group 2 process vent specified in either paragraph (d) or (3) of this section, whichever is applicable. Subparts F and G - Process Vent Provisions. [40 CFR 63.113(a)(3)]
 Monitor DADPM Distillation/Effluent Vent and Methanol Fractionator Vent condenser outlet temperatures continuously and record daily average temperature. Subparts F and G - Process Vent Provisions. [40 CFR 63.114(b)]
 Submit semiannual reports. Subparts F and G - Process Vent Provisions. [40 CFR 63.118(f)]

EQT0903 TT-6116A - CDU Cooler

- 317 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 318 [LAC 33.III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0904 TT-6116B - CDU Cooler

- 319 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 320 [LAC 33.III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT0905 TT-6116C - CDU Cooler

- 321 [40 CFR 63.104(b)] Monitor cooling water system to detect methylene dianiline leak. [40 CFR 63.104(b)]
 322 [LAC 33.III.5109.A] Monitor influent and effluent of cooling tower to detect methylene dianiline leak per 40 CFR 63.104(b).

EQT1193 IQ - HCl Scrubber AS-5401 and Maintenance

- 323 [40 CFR 63.9000(a)] Chlorine >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20030019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT1193 IQ - HCl Scrubber AS-5401 and Maintenance

- 324 [40 CFR 63.9000(a)] Hydrochloric acid > 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
- Which Months: All Year Statistical Basis: None specified
- Flow rate >= 4.4 gallons/min. Limit the scrubber inlet liquid or recirculating liquid flow rate, except as noted in 40 CFR 63.9000(c). Subpart NNNNN. [40 CFR 63.9000(b)]
- Which Months: All Year Statistical Basis: Daily average
- Maintain the operating parameter(s) within the operating limits established according to the monitoring plan established under 40 CFR 63.8(f), except as noted in 40 CFR 63.9000(c). Subpart NNNNN. [40 CFR 63.9000(b)]
- pH >= 8 s.u.. Limit the scrubber effluent pH, except as noted in 40 CFR 63.9000(c). Subpart NNNNN. [40 CFR 63.9000(b)]
- Which Months: All Year Statistical Basis: Daily average
- Comply with all applicable provisions of 40 CFR 63, NESHAP Subpart NNNNN, Hydrochloric Acid Production.
- Conduct all applicable performance tests according to the procedures in 40 CFR 63.9020 on the earlier of the title V operating permit renewal or within 5 years of issuance of the title V permit. Also conduct all applicable performance tests whenever process changes are made that could reasonably be expected to increase the outlet concentration. Subpart NNNNN. [40 CFR 63.9015(a)]
- Submit performance test results: Due within 60 days after the completion of subsequent performance tests. Also verify that the operating limits have not changed, or provide documentation of revised operating limits established as specified in 40 CFR 63 Subpart NNNNN, Table 2. Include all applicable information required in 40 CFR 63.9050. Subpart NNNNN. [40 CFR 63.9015(b)]
- Conduct each applicable performance test in 40 CFR 63 Subpart NNNNN, Table 3 as directed in 40 CFR 63.9020(a)(1) through (4), except as noted in 40 CFR 63.9020(b) and (c). Subpart NNNNN. [40 CFR 63.9020(a)]
- If complying with a percent reduction emission limitation, determine the percent reduction in accordance with 40 CFR 63.9020(b)(1) and (b)(2). Subpart NNNNN. [40 CFR 63.9020(b)]
- Flow rate >= 4.4 gallons/min.
- Which Months: All Year Statistical Basis: Daily average
- Flow rate monitored by CMS continuously. Monitor the scrubber inlet liquid or recirculating liquid flow rate. Subpart NNNNN. [40 CFR 63.9025(a)]
- Which Months: All Year Statistical Basis: Daily average
- pH monitored by CMS continuously. Monitor the scrubber effluent pH. Subpart NNNNN. [40 CFR 63.9025(a)]
- Which Months: All Year Statistical Basis: Daily average
- Submit a monitoring plan to DEQ that meets the requirements in 40 CFR 63.9025(a) and (b)(1) through (b)(3), in accordance with 40 CFR 63.8(f). Conduct monitoring in accordance with the plan submitted, unless comments received from DEQ require an alternate monitoring scheme. Subpart NNNNN. [40 CFR 63.9025(b)]
- Collect flowrate and pH monitoring data and reduce data to 1-hour and daily block averages. Submit periodic reports with exceedances noted. [40 CFR 63.9025, 40 CFR 63.9050]
- Establish the site-specific operating limit(s) in 40 CFR 63 Subpart NNNNN, Table 2, as applicable, according to the requirements in 40 CFR 63.9020 and 40 CFR 63 Subpart NNNNN, Table 3. Subpart NNNNN. [40 CFR 63.9030(b)]
- Flow rate recordkeeping by electronic or hard copy continuously. Record the scrubber inlet liquid or recirculating liquid flow rate. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT1193 IQ - HCl Scrubber AS-5401 and Maintenance

340 [40 CFR 63.9035(b)(2)]

pH recordkeeping by electronic or hard copy continuously. Record the scrubber effluent pH. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(2)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]

EQT1194 MF-571A - HCl Storage Tank MF-571A

342 [40 CFR 63.9000(a)]

Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Reduce HCl emissions from storage tanks at existing source by 99% or greater or 120 ppmv or less (NESHPAP Subpart NNNNN).
 Conduct all applicable performance tests according to the procedures in 40 CFR 63.9020 on the earlier of the title V operating permit renewal or within 5 years of issuance of the title V permit. Subpart NNNNN. [40 CFR 63.9015(a)]
 Submit performance test results: Due within 60 days after the completion of subsequent performance tests. Also verify that the operating limits have not changed or provide documentation of revised operating limits established as specified in 40 CFR 63 Subpart NNNNN, Table 2. Include all applicable information required in 40 CFR 63.9050. Subpart NNNNN. [40 CFR 63.9015(b)]
 Conduct each applicable performance test in 40 CFR 63 Subpart NNNNN, Table 3 as directed in 40 CFR 63.9020(a)(1) through (4), except as noted in 40 CFR 63.9020(b) and (c). Subpart NNNNN. [40 CFR 63.9020(a)]
 If complying with percent reduction emission limitation, determine the percent reduction in accordance with 40 CFR 63.9020(b)(1) and (b)(2). Subpart NNNNN. [40 CFR 63.9020(b)]
 Prepare a design evaluation that includes documentation demonstrating that the control technique being used achieves the required control efficiency when a liquid HCl product with the concentration of 30 weight percent or greater is being loaded into the storage tank, or a tank truck, rail car, ship, or barge. Subpart NNNNN. [40 CFR 63.9020(c)].
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]

EQT1195 MF-572A - HCl Storage Tank MF-572A

350 [40 CFR 63.9000(a)]

Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Reduce HCl emissions from storage tanks at existing source by 99% or greater or 120 ppmv or less (NESHPAP Subpart NNNNN).
 Conduct all applicable performance tests according to the procedures in 40 CFR 63.9020 on the earlier of the title V operating permit renewal or within 5 years of issuance of the title V permit. Subpart NNNNN. [40 CFR 63.9015(a)]
 Submit performance test results: Due within 60 days after the completion of subsequent performance tests. Also verify that the operating limits have not changed or provide documentation of revised operating limits established as specified in 40 CFR 63 Subpart NNNNN, Table 2. Include all applicable information required in 40 CFR 63.9050. Subpart NNNNN. [40 CFR 63.9015(b)]
 Conduct each applicable performance test in 40 CFR 63 Subpart NNNNN, Table 3 as directed in 40 CFR 63.9020(a)(1) through (4), except as noted in 40 CFR 63.9020(b) and (c). Subpart NNNNN. [40 CFR 63.9020(a)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

EQT1195 MF-572A - HCl Storage Tank MF-572A

- If complying with a percent reduction emission limitation, determine the percent reduction in accordance with 40 CFR 63.9020(b)(1) and (b)(2)
 Subpart NNNNN. [40 CFR 63.9020(b)]
 Prepare a design evaluation that includes documentation demonstrating that the control technique being used achieves the required control efficiency when a liquid HCl product with the concentration of 30 weight percent or greater is being loaded into the storage tank, or a tank truck, rail car, ship, or barge. Subpart NNNNN. [40 CFR 63.9020(c)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]

EQT1196 MF-573A - HCl Storage Tank MF - 573A

- Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Reduce HCl emissions from storage tanks at existing source by 99% or greater or 120 ppmv or less (NESHAP Subpart NNNNN).
 Conduct all applicable performance tests according to the procedures in 40 CFR 63.9020 on the earlier of the title V operating permit renewal or within 5 years of issuance of the title V permit. Subpart NNNNN. [40 CFR 63.9015(a)]
 Submit performance test results: Due within 60 days after the completion of subsequent performance tests. Also verify that the operating limits have not changed or provide documentation of revised operating limits established as specified in 40 CFR 63 Subpart NNNNN, Table 2. Include all applicable information required in 40 CFR 63.9050. Subpart NNNNN. [40 CFR 63.9015(b)]
 Conduct each applicable performance test in 40 CFR 63 Subpart NNNNN, Table 3 as directed in 40 CFR 63.9020(a)(1) though (4), except as noted in 40 CFR 63.9020(b) and (c). Subpart NNNNN. [40 CFR 63.9020(a)]
 If complying with a percent reduction emission limitation, determine the percent reduction in accordance with 40 CFR 63.9020(b)(1) and (b)(2).
 Subpart NNNNN. [40 CFR 63.9020(b)]
 Prepare a design evaluation that includes documentation demonstrating that the control technique being used achieves the required control efficiency when a liquid HCl product with the concentration of 30 weight percent or greater is being loaded into the storage tank, or a tank truck, rail car, ship, or barge. Subpart NNNNN. [40 CFR 63.9020(c)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]

FUG0020 KS - MDI Plant Fugitive Emissions

- Optional credit for removed connectors. If an owner or operator eliminates a connector subject to monitoring under paragraph (b) of this section, the owner or operator may receive credit for elimination of the connector, as described in paragraph (i) of this section, provided the requirements in paragraph (j)(1) through (j)(4) are met. [40 CFR 51.63(174)(j)]
 Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. Subpart H. [40 CFR 63.162(c)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
 Permit Number: 2391-V09
 Air - Title V Regular Permit Renewal

FUG0020 KS - MDI Plant Fugitive Emissions

- Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(i)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]
- Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(c) through (j). If a reading of 10,000 ppm (phase I); 5,000 ppm (phase II); or 5,000 ppm (phase III, pumps handling polymerizing monomers), 2,000 ppm (phase III, pumps in food/meat service), or 1,000 ppm (phase III, all other pumps) or greater is recorded; a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]
- Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]
- Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]
- Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172, or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(1)]
- Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(2)]
- Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system 63.163(e)(3)]
- Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(4)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
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FUG0020 KS - MDI Plant Fugitive Emissions

- Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)(i)]
- Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)]
- Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)]
- Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(1)]
- Pumps in light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in 40 CFR 63.162(b) and 40 CFR 63.164(h) and (i). Subpart H. [40 CFR 63.164(a)]
- Compressors: Operate the seal system with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or equip with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid directly into a process stream. Subpart H. [40 CFR 63.164(b)]
- Compressors: Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.164(c)]
- Compressors: Equip each barrier fluid system as described in 40 CFR 63.164(a) through (c) with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.164(d)]
- Compressors (sensor): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.164(e)(2)]
- Compressors: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.164(g)]
- Compressors (no detectable emissions): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, and at other times requested by DEQ. Comply with this requirement instead of the requirements in 40 CFR 63.164(a) through (h). Subpart H. [40 CFR 63.164(i)(2)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

All ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
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 Air - Title V Regular Permit Renewal

FUG0020 KS - MDI Plant Fugitive Emissions

- Compressors (sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an alarm, unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under 40 CFR 63.164(e)(2), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.164(g). Subpart H.
- Which Months: All Year Statistical Basis: None specified
- Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
- Which Months: All Year Statistical Basis: None specified
- Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
- Which Months: All Year Statistical Basis: None specified
- Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.165(a) and (b). Subpart H. [40 CFR 63.165(d)(2)]
- Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.
- Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
- Which Months: All Year Statistical Basis: None specified

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- 400 [40 CFR 63.168(d)(2)] Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). Subpart H. [40 CFR 63.168(d)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]
- Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(f)(3)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(f)]
- Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(1)]
- Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(1)]
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(3)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps [including pumps in food/medical service], or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]

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- Surge control vessels and bottoms receivers: Equip with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements of 40 CFR 63.172, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63.119(b) or (c), if surge control vessel or bottoms receiver is not routed back to the process and meets the conditions specified in 40 CFR 63 Subpart H Table 2 or Table 3. Subpart H.
- Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(iii)]
- Closed-vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination monthly to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. Subpart H. [40 CFR 63.172(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (bypass lines): Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. Subpart H. [40 CFR 63.172(j)(2)]
- Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(f)(1) or (f)(2). Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(1)]
- Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(2)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(1)]

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- 421 [40 CFR 63.172(l)(2)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(2)]
- Which Months: All Year Statistical Basis: None Specified
- Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- Agitators in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
- Which Months: All Year Statistical Basis: None Specified
- Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
- Which Months: All Year Statistical Basis: None Specified
- Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(c)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the agitator stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172, or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(1)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid organic HAP service. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(2)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(3)]
- Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(4)]
- Which Months: All Year Statistical Basis: None Specified
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)(i)]

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- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171; Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)]
- Agitators in gas/vapor service or light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(1)]
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(3)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]
- Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within 12 months after the compliance date, except as provided in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(1)]
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within the first 12 months after initial startup or by no later than 12 months after the date of promulgation of a specific subpart that references 40 CFR 63 Subpart H, whichever is later, except as specified in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(2)]
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(1)]
- Which Months: All Year Statistical Basis: None specified

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440	[40 CFR 63.174(b)(3)(ii)]	Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]
441	[40 CFR 63.174(c)(1)(i)]	Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]
442	[40 CFR 63.174(c)(2)(i)]	Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Comply with the requirements of 40 CFR 63.169 Subpart H. [40 CFR 63.174(c)(2)(i)]
443	[40 CFR 63.174(c)(2)(ii)]	Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Organic HAP monitored by technically sound method within three months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If monitoring detects a leak, implement repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(c)(2)(ii)]
444	[40 CFR 63.174(d)]	Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
445	[40 CFR 63.174(f)(1)]	Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (e). Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(1)]
446	[40 CFR 63.174(f)(2)]	Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(2)]
447	[40 CFR 63.174(g)(1)]	Which Months: All Year Statistical Basis: None specified (1) The owner or operator determines that repair personnel would be exposed to an immediate danger as a consequence of complying with paragraph (d) of this section; and (2) The connector will be repaired before the end of the next scheduled process unit shutdown. [40 CFR 63.174(g)(1), 40 CFR 63.174(g)(2)]
448	[40 CFR 63.174(g)]	Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Comply with this requirement instead of the requirements in 40 CFR 63.174(a), (d), and (e). Subpart H. [40 CFR 63.174(g)]
449	[40 CFR 63.174(h)(2)]	Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Comply with this requirement instead of the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. Subpart H. [40 CFR 63.174(h)(2), 40 CFR 63.174(h)(3)]
450	[40 CFR 63.174(i)]	Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]

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- 451 [40 CFR 63.175-179] Shall comply with all requirements in 40 CFR 63.175 through 63.179.
- 452 [40 CFR 63.180] Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.
- 453 [40 CFR 63.181] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181(a) through (k). Subpart H:
- Each owner or operator of a source subject to this subpart shall submit the reports listed in paragraphs (a)(1) through (a)(5) of this section. Owners or operators requesting an extension of compliance shall also submit the report listed in paragraph (a)(6) of this section. [40 CFR 63.182(a)]
- 454 [40 CFR 63.182(b)] Submit application: Due as soon as practicable before the construction or reconstruction is planned to commence (but it need not be sooner than 90 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H). Submit application for approval of construction or reconstruction required by 40 CFR 63.5(d) in lieu of the Initial Notification. Subpart H. [40 CFR 63.182(b)(ii)]
- 455 [40 CFR 63.182(b)(iii)] Submit Initial Notification: Due within 90 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(b)(1). Subpart H. [40 CFR 63.182(b)(iii)]
- 456 [40 CFR 63.182(b)(iv)] Submit Initial Notification: Due within 120 days after the date of promulgation of the subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(b)(1). Subpart H. [40 CFR 63.182(b)(2)]
- 457 [40 CFR 63.182(b)] Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]
- 458 [40 CFR 63.182(c)] The information listed in paragraph (c) of this section for the Notification of Compliance Status for process units with later compliance dates. Any revisions to items reported in earlier Notifications of Compliance Status, if the method of compliance has changed since the last report. [40 CFR 63.182(d)(4)]
- 459 [40 CFR 63.182(d)(4)] Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c).
- 460 [40 CFR 63.182(d)] Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)(1)]
- 461 [40 CFR 63.b(1)] Any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass, or glass-lined), is exempt from the monitoring requirements of paragraphs (a) and (c) of this section and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182 of this subpart. [40 CFR 63.b(1)]
- 462 [LAC 33.III.211] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 463 [LAC 33.III.212] Compliance with NESHAP (HON) Subparts F and H in accordance with the streamlining provisions in Appendix A constitutes MACT. No further control required. [LAC 33.III.212, LAC 33.III.5109, 40 CFR 60. Subpart VV, 40 CFR 63. Subpart F, 40 CFR 63 Subpart H]
- 464 [LAC 33.III.507.H.1.a] Comply with 40 CFR 63 Subpart H - HON for the MDI Plant in accordance with streamlined fugitives monitoring program defined in Part 70 : Specific Condition in Appendix A.
- 465 [LAC 33.III.507.H.1.a] Fugitive emission piping components may be added to or removed from the permitted units, without triggering the need to apply for a permit modification provided all the following are adhered to: a) Changes in components involve routine maintenance or are undertaken to address safety concerns, or involve small piping revisions with no associated emissions increases except from the fugitive emission components themselves; b) Changes do not involve any associated increase in production rate or capacity, or tie in of new or modified process equipment other than the piping components; d) The components are promptly incorporated into any applicable leak detection and repair program. If discrepancies arise between these specific requirements (for this emission source) and the regulations, the regulations will prevail.
- 466 [LAC 33.III.507.H.1.a]

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FUG0021 ZU - Wastewater System Fugitives

- Certain portions of this process stream are classified as a Group 1 wastewater stream and treated in accordance with 40 CFR 63.138(h)(3). [40 CFR 63.100, 40 CFR 63.132]
- Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
- Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
- Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]
- Comply with the requirements of paragraphs 63.105(b) through (e) for maintenance wastewater containing organic HAPs listed in Table 9 of Subpart G of this part. [40 CFR 63.105(a)]
- Maintenance wastewater: Prepare a description of maintenance procedures for the management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair and during periods which are not shutdowns as specified in 40 CFR 63.105(b)(1) through (b)(3). Modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.
- Subpart F. [40 CFR 63.105(a)]
- Maintenance wastewater: Implement the procedures described in 40 CFR 63.105(b) and (c) as part of the start-up, shutdown and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(d)]
- Maintenance wastewater: Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain a record of the information required by 40 CFR 63.105(b) and (c) as part of the start-up, shut-down, and malfunction plan required under 40 CFR 63.6(e)(3).
- Subpart F. [40 CFR 63.105(e)]
- Comply with NESHAP (HON) Subpart F and G, 40 CFR 63.100, 63.105, 63.132, and 63.149.

GRP0041 Caustic Scrubbers KC, MA, and ZE

Group Members: EQT0370 EQT0400 EQT0444

- 476 [LAC 33:III.507.H.1.a] Carbon monoxide monitored by calculations monthly.
 Which Months: All Year Statistical Basis: None specified
- 477 [LAC 33:III.507.H.1.a] Carbon monoxide: To demonstrate compliance with the CO emission limit for the source GRP041, KC, MA, and ZE, permittee shall calculate the total CO emissions for a 12-month rolling period. Total CO emissions in the cap shall not exceed 816.28 tons per year. Permittee shall retain records for review by the Office of Environmental Compliance, Surveillance Division, CO emissions above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. Emission points: EQT 370, 400 and 444.

GRP0042 Fume Scrubber Emissions KB, ZI, ZA

Group Members: EQT0369 EQT0449 EQT0474

SPECIFIC REQUIREMENTS

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GRP0042 Fume Scrubber Emissions KB, ZI, ZA

Monitor DADPM Distillation/Effluent Vent and Methanol Fractionator Vent condenser outlet temperatures continuously. Keep records of performances tests, TRE and vent condenser temperatures. Periodic reports are due semi-annually (40 CFR 60.114(b), 40 CFR 60.117(a)(7), 40 CFR 60.118(b), 40 CFR 60.118(f). [40 CFR 63.100, 40 CFR 63.113(a)(3)]

Monitor scrubber pH and flow rate continuously. Record daily average flowrate and scrubber pH. Maintain performance test or design evaluation records. Periodic reports are due semi-annually (40 CFR 63.600(d), 40 CFR 63.9025, 40 CFR 63.9050, 40 CFR 63.9075 Table 3 and Table 6). 40 CFR Subpart NNNNN.

Production rate <= 1631 MM lbs/yr.

Which Months: All Year Statistical Basis: Annual average

Production rate recordkeeping by electronic or hard copy monthly.

Production rate: To demonstrate compliance with the production rate limit for the source GRP 42, Fume Scrubber Emission Cap, permittee shall calculate the total production rate for a 12-month rolling period. Total production rate shall not exceed 1631 million pounds per year. Permittee shall retain records for review by the Office of Environmental Compliance, Surveillance Division. Production rates above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. Emission points: EQT 369, EQT 449, and EQT 474. Permittee shall retain records for review by the Office of Environmental Compliance, Surveillance Division. Production rate above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.

Surge control vessels with vapor pressure limits below that to be controlled under the HON (40 CFR 63.183 Table 2) are routed to this source. Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. No additional control is required.

GRP0044 MDI 1 Cooling Towers GT-4501, GT-4528, and GT-4938

Group Members: EQT0393 EQT0394 EQT0395

Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
 Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]

Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]

Heat exchange systems (cooling water); HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more specialized HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b), 40 CFR 63.104(b)(1)]
 Which Month(s): All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20080019
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 Alt - Title V Regular Permit Renewal

FUG0021 ZU - Wastewater System Fugitives

- Certain portions of this process stream are classified as a Group I wastewater stream and treated in accordance with 40 CFR 63.138(h)(3). [40 CFR 63.100, 40 CFR 63.132]
- Comply with the requirements of 40 CFR 63 Subparts G and H. Subpart F. [40 CFR 63.102(a)]
- Maintain all applicable records in such a manner that they can be readily accessed. Retain the most recent 6 months of records on site or make accessible by computer or other means that provides access within 2 hours after a request. Subpart F. [40 CFR 63.103(c)(1)]
- Keep copies of all applicable reports and records required by 40 CFR 63 Subparts F, G, and H for at least 5 years. If 40 CFR 63 Subparts G or H require records to be maintained for a time period different than 5 years, maintain those records for the time specified in 40 CFR 63 Subparts G or H. Subpart F. [40 CFR 63.103(c)]
- Comply with the requirements of paragraphs 63.105(b) through (e) for maintenance wastewater containing organic HAPs listed in Table 9 of Subpart G of this part. [40 CFR 63.105(a)]
- Maintenance wastewater: Prepare a description of maintenance procedures for the management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair and during periods which are not shutdowns as specified in 40 CFR 63.105(b)(1) through (b)(3). Modify and update the information required by 40 CFR 63.105(b) as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure. Subpart F. [40 CFR 63.105(a)]
- Maintenance wastewater: Implement the procedures described in 40 CFR 63.105(b) and (c) as part of the start-up, shutdown and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(d)]
- Maintenance wastewater: Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain a record of the information required by 40 CFR 63.105(o) and (c) as part of the start-up, shut-down, and malfunction plan required under 40 CFR 63.6(e)(3). Subpart F. [40 CFR 63.105(e)]
- Comply with NESHAP (HON) Subpart F and G, 40 CFR 63.100, 63.105, 63.132, and 63.149.

GRP0041 Caustic Scrubbers KC, MA, and ZE

Group Members: EQT0370 EQT0400 EQT0444

- 476 [LAC 33:III.507.H.1.a] Carbon monoxide monitored by calculations monthly.

Which Months: All Year Statistical Basis: None specified

Carbon monoxide: To demonstrate compliance with the CO emission limit for the source GRP041, KC, MA, and ZE, permittee shall calculate the total CO emissions for a 12-month rolling period. Total CO emissions in the cap shall not exceed 816.28 tons per year. Permittee shall retain records for review by the Office of Environmental Compliance, Surveillance Division, CO emissions above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. Emission points: EQT 370, 400 and 444.

GRP0042 Fume Scrubber Emissions KB, ZI, ZA

Group Members: EQT0369 EQT0449 EQT0474

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER2008019
 Permit Number: 2391-V09
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GRP0044 MDI 1 Cooling Towers GT-4501, GT-4528, and GT-4938

- 488 [40 CFR 63.104(d)] Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d), 40 CFR 63.104(d)(1), 40 CFR 63.104(d)(2)]
- 489 [40 CFR 63.104(e)] Delay of repair of heat exchange systems for which leaks have been detected is allowed if the equipment is isolated from the process. Delay of repair is also allowed if repair is technically infeasible without a shutdown and any one of the conditions in paragraph (e)(1) or (e)(2) of this section is met. All time periods in paragraphs (e)(1) and (e)(2) of this section shall be determined from the date when the owner or operator determines that delay of repair is necessary. [40 CFR 63.104(e)]
- 490 [40 CFR 63.104(f)(2)] If an owner or operator invokes the delay of repair provisions for a heat exchange system, the following information shall be submitted in the next semi-annual periodic report required by 40 CFR 63.152(c) of subpart G of this part. If the leak remains unrepairs, the information shall also be submitted in each subsequent periodic report, until repair of the leak is reported. [40 CFR 63.104(f)(2)]
- 491 [40 CFR 63.104(f)] Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy continuously. Retain the records identified in 40 CFR 63.104(f)(1) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]
- 492 [40 CFR 63.406] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain copies of the initial notification and the notification of compliance status as required by 40 CFR 63.405 for a period of at least 5 years onsite. Subpart Q.

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- 493 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 494 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies.
- 495 [40 CFR 61.148] Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]
- 496 [40 CFR 61.355] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 497 [40 CFR 61.356] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (l), as applicable. Subpart FF.
- 498 [40 CFR 61.357(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain records as specified in 40 CFR 61.356(a) through (n). Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 499 [40 CFR 61.] Submit a report that summarizes the regulatory status of each waste stream subject to 40 CFR 61.355. Include the information specified in 40 CFR 61.342 and is determined by the procedures specified in 40 CFR 61.355(c) to contain benzene.
- 500 [40 CFR 63.] If there is no benzene onsite in wastes, products, by-products, or intermediates, submit an initial report that is a statement to this effect. Subpart FF. [40 CFR 61.357(a)]
- 501 [40 CFR 70.5(a)(1)(iii)] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.
- Submit Title V permit application for renewal: Due six months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]

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 Air - Title V Regular Permit Renewal

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- 502 [40 CFR 70.6(a)(3)(iii)(A)]
 Submit Title V monitoring results report. Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 503 [40 CFR 70.6(a)(3)(iii)(B)]
 Submit Title V excess emissions report. Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]
- 504 [40 CFR 70.6(e)(5)(iv)]
 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 505 [LAC 33:III.1103]
 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111.
- 506 [LAC 33:III.1303.B]
 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 507 [LAC 33:III.2113.A]
 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 508 [LAC 33:III.219]
 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 509 [LAC 33:III.2901.D]
 Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 510 [LAC 33:III.2901.F]
 If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 511 [LAC 33:III.5105.A.1]
 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard.
- 512 [LAC 33:III.5105.A.2]
 Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 513 [LAC 33:III.5105.A.3]
 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 514 [LAC 33:III.5105.A.4]
 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
- 515 [LAC 33:III.5109.A]
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ

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- Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment, and that emissions would be controlled to a level that is Maximum Achievable Control Technology.
- Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112. Table 51.2. Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III. Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department.
- Obtain a Louisiana Air Permit in accordance with LAC 33:III.5111.B and C and in accordance with LAC 33:1.1701, before commencement of the construction of any new source.
- Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source.
- Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel.
- Submit test results: Due in writing to the Office of Environmental Assessment, Environmental Technology Division within 45 days after completion of the test. Submit test results signed by the person responsible for the test.
- Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
- Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department.
- Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e.
- Analyze samples and determine emissions within 30 days after each emission test has been completed, unless otherwise specified.
- Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ.
- Submit notification in writing. Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin.

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- 533 [LAC 33:III.5113.C.2]
 Submit performance evaluation report. Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 60 days of the monitoring system performance evaluation.
- 534 [LAC 33:III.5113.C.3]
 Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems.
- 535 [LAC 33:III.5113.C.5.a]
 Evaluate the performance of continuous monitoring systems, upon request by DEQ, in accordance with the requirements and procedures contained in the applicable performance specification of 40 CFR Part 60, appendix B.
- 536 [LAC 33:III.5113.C.5.a]
 Submit report. Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days.
- 537 [LAC 33:III.5113.C.5.d]
 Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS.
- 538 [LAC 33:III.5113.C.5.e]
 Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS.
- 539 [LAC 33:III.5113.C.5]
 Submit plan: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system.
- 540 [LAC 33:III.5113.C.7]
 Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 541 [LAC 33:III.5151.F.1.f]
 An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 542 [LAC 33:III.5611.A]
 Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency. Due within 30 days after requested by the administrative authority.
- 543 [LAC 33:III.5611.B]
 During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 544 [LAC 33:III.5901.A]
 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 545 [LAC 33:III.5907]
 Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 546 [LAC 33:III.5911.A]
 Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division.
- 547 [LAC 33:III.5911.C]
 Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20080019

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Where, upon written application of the responsible person or persons, the administrative authority finds that by reason of exceptional circumstances strict conformity with any provisions of these regulations would cause undue hardship, would be unreasonable, impractical or not feasible under the circumstances, the administrative authority may permit a variance from these regulations.

No variance may permit or authorize the maintenance of a nuisance, or a danger to public health or safety.

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33.III.919.A-D.

Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33.I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33.I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.

548 [LAC 33.III.917.A]

549 [LAC 33.III.917.B]

550 [LAC 33.III.919.D]

551 [LAC 33.III.927]